
Scholls Heights at South Cooper Mountain Beaverton, Oregon

Request for
Comprehensive Plan Map Amendment
Quasi-Judicial Zoning Map Amendment
Conditional Use (Planned Unit Development)
Land Division (Preliminary Subdivision)
Design Review
Tree Plan
Sidewalk Modification

Prepared for
West Hills Land Development

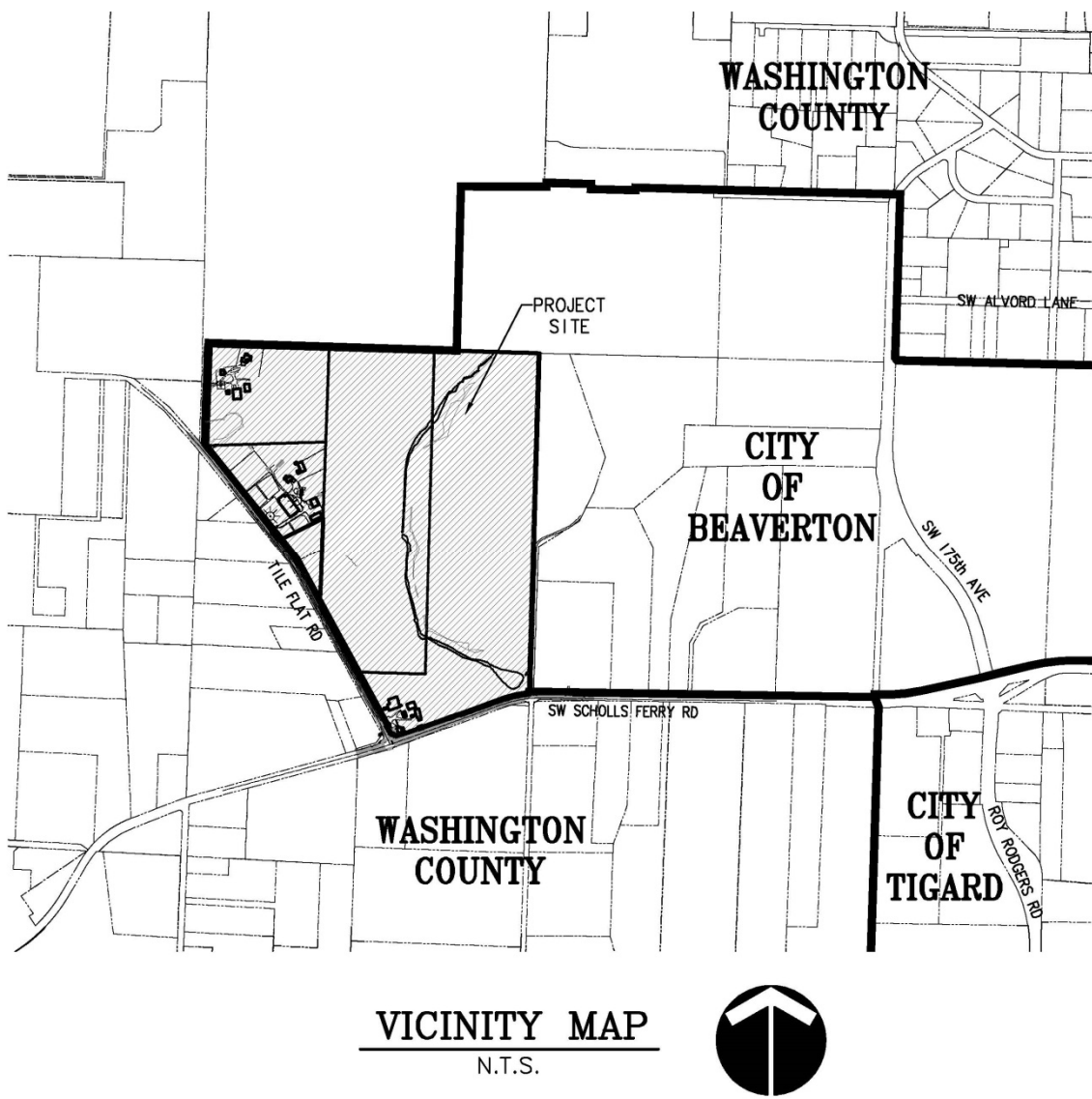
Prepared by
Otak, Inc.



Novemeber 3, 2017
Otak Project No. 17480

REQUESTS

Comprehensive Plan Map Amendment, Quasi-Judicial Zoning Map Amendment, Conditional Use (Planned Unit Development), Land Division (Preliminary Subdivision), Design Review, Tree Plan, and Sidewalk Design Modification approvals are requested for the 132.15-acre Scholls Heights at South Cooper Mountain Planned Unit Development (PUD) within the South Cooper Mountain Community Planning area. The initial Land Division application will establish 13 large lots that follow phasing and zone boundaries; a subsequent Land Division will occur as each phase is developed. The Scholls Heights at South Cooper Mountain PUD will include 471 lots for detached single-family homes and 205 lots for attached single-family homes (townhomes). It will also include a parcel for future multi-family residential development of 216 to 275 units for a total of 677 lots and between 892 and 951 units.



SITE INFORMATION

SUBJECT PROPERTIES:	132.15 acres: Parcel I: 18865 SW Scholls Ferry Road (Taxlot 2S2010000100) Parcel II: 12160 SW Kobbe Road (Taxlot 2S2010000200) Parcel III: No situs (Taxlot 2S2010000101) Parcel IV: 19293 SW Tile Flat Road (Taxlot 2S2010000201)
COMPREHENSIVE PLAN DESIGNATION:	Urban High Density Residential; Urban Medium Density Residential; Urban Standard Density Residential
ZONING DESIGNATION:	<i>Current:</i> Washington County Interim Zoning (AF-20) <i>Proposed:</i> City of Beaverton R1; R2; R4; R5; R7

APPLICANT/PROPERTY OWNER

APPLICANT(S):	West Hills Land Development, LLC 3330 NW Yeon Avenue, Suite 200 Portland, OR 97210 Contact: Dan Grimberg 503.726.7033 Dan@westhillsdevelopment.com
OWNER(S):	Parcel I: 18865 SW Scholls Ferry Road Lewis E. Bierly, John A. Bierly, Susan E. Thompson, Christine H. Cullen, Carol A. Baumgartel and Philip S. Bierly 18865 SW Scholls Ferry Road Beaverton, OR 97007 Parcel II: 12160 SW Kobbe Road John A. Bierly 12160 SW Kobbe Road Beaverton, Oregon 97007 Parcel III: Taxlot 2S2010000101 Hubert F. Bierly and Jeanette H. Bierly, Trustees 26690 Horsell Road Bend, OR 97701 Parcel IV: 19293 SW Tile Flat Road Bierly Property Holdings, LLC 19293 SW Tile Flat Road Beaverton, OR 97007

PROJECT DEVELOPMENT TEAM

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- D. Land Use Summaries dated October 4, 2017, by Otak, Inc.
- E. Beaverton School District School Service Provider Statement dated April 28, 2017
- F. Philips Lumec Hexagonal Lantern Series Lighting Specifications Cut Sheets
- G. Proposed Retaining Wall Systems dated July 26, 2017 by Otak, Inc.
- H. Strobel Road Sales Agreement dated July 29, 2016
- I. Parcel Report dated October 31, 2017, by Otak, Inc.
- J. Approval of Street K dated September 21, 2017, from Gary Stockhoff to City of Beaverton staff
- K. Graphics illustrating compliance with the standards of 60.15.10 dated October 10, 2017, by Mike Peebles, PE

X. Impact Studies

- A. Natural Resources Assessment by AKS Engineering & Forestry, dated July 17, 2017
- B. Scholls Heights at South Cooper Mountain Draft Stormwater Management Plan dated September 28, 2017, by Otak, Inc.
- C. Flood Study Memorandum “Lolich and Bellairs Existing Drainages” dated January 4, 2017, by Otak, Inc.
- D. Geotechnical Engineering Report – Bierly Property dated September 24, 2015, by Hardman Geotechnical, Inc.
- E. Memorandums by Kittelson & Associates, Inc.
 - Memorandum “Response to City Comments” dated October 12, 2017
 - Memorandum “Phasing Analysis” dated August 22, 2017
 - Memorandum “Estimated Local Street Volumes” dated May 23, 2017
 - Memorandum “Traffic Impact Analysis/Access Report” dated May 22, 2017
- F. Memorandum “Scholls Heights at South Cooper Mountain Landscape Architect’s Note for Trees to be Preserved” dated July 27, 2017, by Otak, Inc.

XI. Plan Sheets / Exhibits

Civil Plan Set

- Sheet P0.0 Cover Sheet
- Sheet P0.1 Site Plan and Sheet Layouts, Aerial Photo
- Sheet P0.2 Preliminary Street Cross Sections
- Sheet P0.3 Land Use Designation & Zoning Plan
- Sheet P0.4 Overall Site Layout Plan
- Sheet P0.5 Phasing Plan

- Sheet P1.1 Existing Conditions Plan
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Sheet L2.2	Preliminary Landscape Plan

Sheet L2.3 Preliminary Landscape Plan
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Sheet P0.5W(2) Site Phasing Plan – West
Sheet P0.5NW(3) Site Phasing Plan – Northwest
Sheet P0.5C(4) Site Phasing Plan – Central
Sheet P0.5NE(5) Site Phasing Plan – Northeast
Sheet P0.5N(6) Site Phasing Plan – North
Sheet P0.5S Site Phasing Plan – South

Note: Above plan sheets are also separately bound in a larger format within the development application submittal.

Architecture Exhibits – Preliminary House/Building Examples

Example detached residential plans and elevations
Example attached residential plans and elevations

I. REQUESTS

Comprehensive Plan Map Amendment, Quasi-Judicial Zoning Map Amendment, Conditional Use (Planned Unit Development), Land Division (Preliminary Subdivision), Design Review, Tree Plan, and Sidewalk Design Modification approvals are requested for the 132.15-acre Scholls Heights at South Cooper Mountain Planned Unit Development (PUD) within the South Cooper Mountain Community Planning area. The initial Land Division application will establish 13 large lots that follow phasing and zone boundaries; a subsequent Land Division will occur as each phase is developed. The Scholls Heights at South Cooper Mountain PUD will include 471 lots for detached single-family homes and 205 lots for attached single-family homes (townhomes). It will also include a parcel for future multi-family residential development of 216 to 275 units for a total of 677 lots and between 892 and 951 units.

Comprehensive Plan Map Amendment approval is requested to adjust the designated land use boundaries for consistency with the requested zoning boundaries.

Quasi-Judicial Zoning Map Amendment approval is requested to apply the City of Beaverton's residential zoning to the site as assigned by the South Cooper Mountain Community Plan. The site currently retains Washington County's AF-20 zoning district but has been annexed to the City of Beaverton.

Conditional Use - Planned Unit Development, and Preliminary Subdivision approvals are requested for the Scholls Heights at South Cooper Mountain Planned Unit Development (PUD) and subdivision. The large lot Preliminary Subdivision application will establish 13 large lots that reflect the proposed phasing and zone boundaries, and the PUD Preliminary Subdivision will further divide each large lot into smaller lots. The site is greater than 10 acres in area and is located within the South Cooper Mountain Community Plan Area, and Planned Unit Development is required.

Design Review 2 approval is requested for the building elevations and landscaping plans for 205 attached single-family dwelling units (townhomes).

Tree Plan 2 approval is requested for removal of trees within a mapped Significant Natural Resource Area (SNRA) to accommodate transportation and utility improvements.

Sidewalk Design Modification approval is requested to allow the construction of curb-tight sidewalks along both sides of Tract E25 to accommodate the grade of the site.

The non-zoning map applications are subject to the requirements of the Needed Housing statutes found in ORS 197.303(1) and 197.307(4). The non-zoning map applications propose housing types included as Needed Housing under ORS 197.303(1). The application site is included in the City's acknowledged Buildable Lands Inventory. The City may apply only clear and objective approval criteria under ORS 197.307(4) to the non-zoning map applications. The Applicant has addressed all of the approval criteria regardless of whether they are subjective but reserves the right to assert that subjective approval criteria are not applicable.

II. PROJECT DESCRIPTION

The site is within the South Cooper Mountain planning area to the northeast of the intersection of SW Tile Flat Road and SW Scholls Ferry Road. SW Strobel Road forms the eastern southeastern boundary of the site. The site consists of four lots totaling 132.15 acres: TLID 2S201 100 (57.42 acres); TLID 2S201 101 (47.03 acres); TLID 2S201 200 (17.11 acres); and TLID 2S201 201 (10.60 acres). The subject sites are currently located within the Beaverton City Limits and in residential and agricultural use.

The proposed 13-lot Preliminary Subdivision includes 13 large lots that will be further divided for the PUD through a concurrent Preliminary Subdivision application. The proposed Scholls Heights at South Cooper Mountain PUD includes 677 lots: 471 lots for detached single-family homes, 205 lots for attached single-family homes, and 1 lot for future multi-family residential development of between 216 and 275 units. The Overall Site Layout Plan for the proposed development is included as Sheet P0.4. The Preliminary Site Layout and House Type Plans are on Sheets P3.0 through P3.12.

The project is proposed to be developed in seven phases. An overview of the proposed development phase and units within each is detailed in Table 1.

Table 1. Proposed Lots and Housing Type

Development Phase*	Detached Single Family Lots	Attached Single Family Lots	Multi-Family (Future Development)	Lots Per Phase
East	162	34	0	196
West	121	23	0	144
Northwest	71	28	0	99
Central	31	75	0	106
Northeast	58	45	0	103
North	28	0	0	28
South	0	0	1	1
TOTAL	471	205	1	677

*Not representative of sequencing.

Open Space

The PUD will include approximately 31.8 acres of Open Spaces in seven phases comprised of active and passive open space, accessible both physically and visually to the development and community. 14.14 acres of required active open space includes a neighborhood park, a multi-use trail along SW Scholls Ferry Road, a regional trail along SW Tile Flat Road, and a community trail to the west of the natural resource areas through the project site.

Water/Sewer/Stormwater

Public water supply for the site will be provided by the City of Beaverton. Water lines will be constructed within the proposed rights-of-way within the development. In accordance with the South Cooper Mountain Water Master Plan amendment, a 24-in. public waterline is to be extended from the existing stub at the west side of the Beaverton School District high school project to the west along the proposed east-west collector (Road 8B). The existing Ridge at South Cooper Mountain land use application proposes an extension of the 24-in. waterline to

SW Strobel Road, where it will be extended further west into the Scholls Heights at South Cooper Mountain project. In addition, waterlines will be stubbed to boundary of the property for future extensions/connections per the Water Master Plan.

Public sanitary sewer for the site will be provided by the City of Beaverton, and will extend from the existing CWS sanitary sewer manhole in Scholls Ferry Road and be routed through the proposed Ridge at South Cooper Mountain to provide a 24-in. stub at SW Strobel Road, north of Scholls Ferry Road, for extension to service the majority of the Scholls Heights at South Cooper Mountain project.

There is a portion of the Scholls Heights at South Cooper Mountain project at the corner of Scholls Ferry Road and Tile Flat Road that will be extended in Scholls Ferry Road to connect into the existing CWS sanitary sewer manhole in Scholls Ferry Road. This 8-in. sanitary sewer extension will mainly provide service to the proposed high density/multifamily portion of the Scholls Heights PUD development and will require design coordination with the existing Scholls Ferry Road culvert crossings and future WWPS waterline project to avoid future conflicts. In addition, sanitary will be stubbed to boundary of the property for future extensions/connections per the Sanitary Sewer Master Plan.

Storm water management facilities will be located throughout the Scholls Heights at South Cooper Mountain PUD to provide storm water management (quantity and quality) in accordance with South Cooper Mountain Community Plan storm water requirements (per previous SCM land use approvals, this requires meeting City of Beaverton and SLOPES V stormwater design standards). Facilities will be located based on topography, drainage basins, proposed phasing, and design coordination with open space/parks/trails. Outfalls will be to the existing north-south drainageway that will outfall to new culvert crossing at Scholls Ferry Road.

A Preliminary Utility Plan is included as Sheets P5.1-P5.6, and a preliminary stormwater management plan is included as Impact Study B.

Traffic/Access

Access to the site is proposed from SW Tile Flat Road to the west and SW Strobel Road to the east. Two new Collector Roads, a Neighborhood Route, and a network of local roads are proposed. A Traffic Impact Analysis (TIA) completed by Kittleson & Associates, Inc., a signal warrant analysis, and a phasing analysis are included as Impact Study E. The TIA indicates that the new PUD will generate 8,558 total daily trips, and the signal warrant analysis recommends that a traffic signal be installed at the intersection of SW Strobel Road and SW Scholls Ferry Road.

Fire Protection

Fire protection will be provided to the site by Tualatin Valley Fire and Rescue Department (TVF&R). Emergency access to the site will be provided by SW Strobel Road to the east, SW Tile Flat Road to the west via Road 6A and Street L1, and within the site via Collector Road 8B and a network of local and neighborhood routes.

Significant Natural Resource Areas (SNRA)

Under the adopted February 2016 South Copper Mountain Annexation Area (SCMAA) Local Wetland Inventory (LWI), the site contains a designated stream and vegetated corridor and a small wetland in the northwest corner of the site. The site also contains Class A, and C Upland Wildlife Habitat and Class II and III Riparian Wildlife Habitat related to the stream and wetlands on site. Some disturbance to the stream and vegetated corridor will be required to construct the new collector roads.

Trees

There are few trees on the site, with the concentration of on-site trees located in the northern section of the natural resource area. No Preserved, Historic, or Significant trees or groves have been identified on the site.

Development of the site will necessitate the removal of the trees outside of the SNRA. Some of these trees are community trees. A Tree Plan Two application, including specific tree plan data and tree removal information, is included in this submittal.

III. COMPLIANCE WITH THE CITY OF BEAVERTON COMPREHENSIVE PLAN

Staff has identified the following relevant Comprehensive Policies as applicable to this application. Most of these policies are implemented by the Beaverton Community Development Code. A Comprehensive Plan Map Amendment is being requested to align the land use designations with the implementing zoning. The requested map amendment is minor and will not reduce the housing capacity of the site, as illustrated in the responses to the approval criteria below.

A. CHAPTER I COMPREHENSIVE PLAN AMENDMENT PROCEDURES ELEMENT

1.1 Amendment Initiation

1.1.2 Property Owner-initiated Amendments

Amendment requests shall be submitted to the Community Development Director for preparation and analysis for a Planning Commission public hearing. The Planning Commission and City Council reserve the right to approve, approve with conditions, or deny any specific request for amendment in accordance with the City's policies and procedures.

Response: The amendment is being initiated by the property owner and the request is being submitted to the Community Development Director with this application.

1.3 Amendment Procedural Categories

Quasi-Judicial Amendments are amendments to a Land Use Map designation as it applies to specific parcels or that applies to a small number of individuals or properties or locations.

Response: The requested amendment is a quasi-judicial amendment. It applies specifically to the project site, which consists of four properties owned by four individuals and entities.

1.5 Criteria for Amending the Comprehensive Plan

1.5.1 Criteria for Legislative and Quasi-judicial Comprehensive Plan Amendments

A. The proposed amendment is consistent and compatible with relevant Statewide Planning Goals and related Oregon Administrative Rules;

Response: The Statewide Planning Goals provide direction to local jurisdictions regarding the State's policies on land use. These goals are implemented at the local level through Comprehensive Plans, which are required and reviewed by the Department of Land Conservation and Development (DLCD) for conformance with the Statewide Planning Goals. It is assumed that the City's adopted Comprehensive Plan (which includes the adopted South Cooper Mountain Community Plan) is in compliance with the Statewide Planning Goals, and that compliance with the Beaverton Comprehensive Plan also demonstrates compliance with the Statewide Planning Goals.

Relevant Statewide Planning Goals and related OAR include:

- Goal 10: Housing (OAR 660-015-0000(10))
- Goal 12: Transportation (OAR 660-015-0000(12))
- Goal 14: Urbanization (OAR 660-015-0000(14))

Responses to each are addressed below.

Goal 10: Housing (OAR 660-015-0000(10))

This goal identifies a need for "needed housing," which is defined for cities having populations larger than 2,500 as attached and detached single-family housing, multiple-family housing, and manufactured homes.

Both the existing and proposed land use designations on the site will continue to provide a range of housing in a variety of densities, including attached and detached single-family housing and multi-family housing.

Goal 12: Transportation (OAR 660-015-0000(12))

This goal identifies the importance of a safe, convenient, and economic transportation system, and requires local jurisdictions to adopt a Transportation System Plan (TSP). The proposal's compliance with the TSP is addressed in Sections III and IV of this narrative.

The proposed map amendment is largely necessitated by the provision of the transportation infrastructure identified by the South Cooper Mountain Community Plan. The proposed street alignment has created zone boundaries that do not line up with the Comprehensive Plan designations of the site areas.

Goal 14: Urbanization (OAR 660-015-0000(14))

This goal identifies the need for orderly and efficient growth, the need to accommodate housing and employment within the urban growth boundary, and the importance of livable communities. The proposed map amendment closely aligns with the land use and density designations of the South Cooper Mountain Community Plan. It does reduce the maximum housing capacity of the site by 3 units, or 0.1%, as shown on Sheet P0.3 and illustrated in Tables 2 and 3 below.

Table 2. Existing Land Use Designations and Housing Capacity

Land Use Designation	Existing Gross Site Area (Acres)	Maximum Capacity (Units)
High Density	11.21	488
Medium Density	111.07	1571
Standard Density	9.87	67
TOTAL	132.15	2,126

Table 3. Proposed Land Use Designations and Housing Capacity

Land Use Designation	Proposed Gross Site Area (Acres)	Maximum Capacity (Units)
High Density	12.75	555
Medium Density	103.63	1443
Standard Density	15.77	109
TOTAL	132.15	2,107

B. The proposed amendment is consistent and compatible with the applicable Titles of the Metro Urban Growth Management Functional Plan and the Regional Transportation Plan;

Response: Beaverton is located within the jurisdiction of Metro, and its local plans and land use ordinance are subject to review by Metro. It is assumed that the City's adopted Comprehensive Plan (which includes the adopted South Cooper Mountain Community Plan) is in compliance

with the Functional Plan, and that compliance with the Beaverton Comprehensive Plan also demonstrates compliance with the Functional Plan.

Applicable Titles of the Functional Plan and Regional Transportation Plan (RTP) include:

- Title 1: Housing Capacity
- Title 11: Planning for New Urban Areas

Responses to each are addressed below.

Title 1: Housing Capacity

As demonstrated above, the proposed map amendment negligibly reduces the maximum housing capacity of the site.

Title 11: Planning for New Urban Areas

The City of Beaverton's adopted South Cooper Mountain Concept Plan and South Cooper Mountain Community Plan include a comprehensive overview of future development in the South Cooper Mountain planning area. The proposed map amendment makes minor revisions to the boundaries of the residential land use designations on the site, but retains the overall density assumed for the site as part of the SCM Plans.

C. The proposed amendment is consistent and compatible with the Comprehensive Plan and other applicable local plans; and

Response: The proposed amendment is consistent and compatible with the Comprehensive Plan and the South Cooper Mountain Community Plan (SCM Plan) as detailed in Sections III and IV of this narrative. The SCM Plan acknowledges that minor revisions to the land use designations within the South Cooper Mountain planning area may be needed to align the land use designations and the proposed zoning.

The existing and proposed land use designations are compared in Tables 2 and 3 above. Overall, very small amounts of the site are shifting from one designation to another, and the overall proportions of each designation remains the same, and there is no change to the densities identified by the SCM Plan.

D. If the proposed amendment is to the Land Use Map, there is a demonstrated public need, which cannot be satisfied by other properties that now have the same designation as proposed by the amendment.

Response: The proposed amendment is to the Land Use Map. The land use designation for the site was applied with the adoption of the SCM Community Plan, and is unique to the South Cooper Mountain planning area. The proposed amendment to the land use designations will allow for consistent alignment between the proposed zoning and street alignments for the site.

B. CHAPTER 3 LAND USE ELEMENT

3.13 Residential Neighborhood Development

3.13.1 Provide for the establishment and maintenance of safe, convenient, attractive and healthful places to live.

Response: The proposed PUD and subdivision contains active and passive open space and preserves significant natural areas on the site. The proposed development contains a variety of housing types and open spaces, and provides for well-connected pedestrian, bicycle, and vehicular circulation within the site and connections to surrounding areas.

- b) *Encourage a variety of housing types in residential areas, by permitting or conditionally permitting any housing type (one, two or more, family dwellings) within any zoning district so long as the underlying residential density of the zoning district is met...*

Response: The proposed Scholls Heights at South Cooper Mountain PUD contains a mix of zoning districts and housing types, including single-family detached and attached housing, and a future multi-family development site in the South Phase. Sheets P3.0 to P3.6 demonstrate the various housing types and locations.

- c) *Require Planned Unit Development application procedures for projects proposing two or more families within the Low Density and Standard Density land use designations. Planned Unit Developments encourage flexibility in standards and provide a mechanism for staff to make adequate findings with respect to compatibility in size, scale, and dimension...*

Response: The Scholls Heights at South Cooper Mountain PUD application proposes two families (R5 and R7) within the Standard Density land use designation, and has been made through the Planned Unit Development application process.

- e) *Apply zoning districts as shown in subsection 3.14 Comprehensive Plan and Zoning District Matrix.*

Response: The section 3.14 Comprehensive Plan and Zoning Matrix shown below identifies the appropriate Comprehensive Plan and Zoning District designations for “neighborhood residential” areas. The matrix states that the Low Density land use designation is implemented by the R10 zone; the Standard Density land use designation is implemented by the R7 and R5 zones; the Medium Density land use designation is implemented by the R4 and R2 zones; and the High Density land use designation is implemented by the R1 zone.

COMPREHENSIVE PLAN AND ZONING DISTRICT MATRIX	
Comprehensive Plan Designation	Zoning District
Downtown Regional Center	RC-E, RC-OT, RC-TO
Washington Square Regional Center	C-WS, OI-WS
Station Community	SC-HDR, SC-MU, SC-E1, SC-E3, SC-S ¹
Town Center	TC-HDR, TC-MU
Main Street	Neighborhood Service, R1, R2
Corridor	General Commercial, Community Service, Neighborhood Service, R1, R2, R4, Corridor Commercial
Employment Areas	Office Industrial
Industrial	Industrial, Office Industrial
Neighborhood Residential (equivalent to Metro’s Inner and Outer Neighborhood Design Types)	
Low Density	R10 ²
Standard Density	R7, R5 ³
Medium Density	R4, R2
High Density	R1
Any of the plan designations cited above	Institutional

The application designates zoning districts to each of the application land use designations (Standard Density, Medium Density, and High Density) compatible with the Metro 2040 Growth Concept and Map and the City’s implementing strategy as shown by Table 4 below.

Table 4. Evaluation of Proposed Comprehensive Plan and Zoning Districts

Land Use Designation	Implementing Zones per 3.14 Matrix	Proposed Implementing Zones
High Density	R1	R1
Medium Density	R2 and R4	R2 and R4
Standard Density	R5 and R7	R5 and R7

g) Enhance the City's landscape through design measures considering the natural setting of the land and the character of existing residential neighborhoods...

Response: As established by the South Cooper Mountain Community Plan, the natural features of the site provide natural boundaries for development. The wetland and stream through the center of the site provides a defining feature for the subdivision and provides access to nature for community residents. The site is at the western edge of the Urban Growth Boundary (UGB), which will result in a transition between the urban development pattern envisioned by the South Cooper Mountain Community Plan and the rural character of the land to the south, west and north of the site. Due to the relatively undeveloped nature of the South Cooper Mountain Area, there are no adjacent existing residential neighborhoods. There are rural residential lots to the west, north, and south of the site; the site to the east is currently being considered for a planned unit development. The neighborhoods being created in this area will incorporate the natural features and setting per the direction provided by the South Cooper Mountain Community Plan.

i) Residential development, in compliance with regional mandates, shall achieve at least 80% of the maximum density allowed in the respective zoning districts as applied through 3.14 Comprehensive Plan and Zoning District Matrix.

Response: The City is responsible for designating minimum and maximum densities in its zoning districts. The proposed development achieves the minimum density allowed in the proposed zoning districts as demonstrated in Table 5 below. The site densities have been averaged among the zones as permitted through the PUD process, and the overall site density exceeds the minimum densities of the zone. Sheet P0.3 illustrates the areas of the site that were removed from the site area to calculate net acreage.

Table 5. Evaluation of Proposed Densities

Land Use Designation	Proposed Zoning	Gross Residential Acres	Net Residential Acres	Maximum Capacity(Units)	Minimum Density (Units)	Proposed Units	Proposed Density (Units per Net Acre)
High Density*	R-1	12.75	6.50	555	282	216	33
Medium Density	R-4	74.65	21.59	812	235	317	15
	R-2	28.98	11.42	631	248	255	22
Standard Density	R-7	11.15	6.59	69	41	75	11
	R-5	4.62	2.31	40	20	29	13
TOTAL		132.15	48.41	2107	826	892	18

3.13.3 Establish Standard Density Residential areas to provide moderate sized lots of typical single-family residences with private open space.

Response: As demonstrated in Table 3, the proposed development includes 15.77 acres zoned for Standard Density residential areas, which are divided into R5 and R7 zoning districts per subsection 3.14 and Table 2 of the South Cooper Mountain Community Plan.

The Scholls Heights at South Cooper Mountain PUD contains a mix of housing types, including single-family detached and attached dwellings. The PUD includes 104 single-family detached dwellings in the R5 and R7 zoning districts. The proposed lots are smaller than the standard required size in these zones, in order to preserve and enhance the natural areas on the site and provide open space areas for the residents.

3.13.4 Establish Medium Density Residential areas to allow for single family attached and detached, and multiple-family developments.

a) *Apply zoning districts as shown in subsection 3.14 Comprehensive Plan and Zoning District Matrix in areas with good access to arterial streets, transit service, commercial service, and public open space.*

Response: As demonstrated in Table 3, the proposed development includes 103.63 acres zoned for Medium Density residential areas, which are divided into R2 and R4 zoning districts per subsection 3.14 and Table 2 of the South Cooper Mountain Community Plan.

The Scholls Heights at South Cooper Mountain PUD contains a mix of housing types, including single-family detached and attached dwellings. The PUD includes 205 attached single-family units and 367 detached single-family units in the R2 and R4 zones. The proposed lots are smaller than the standard required size in these zones, in order to preserve and enhance the natural areas on the site and provide open space areas for the residents.

The Medium Density Residential areas are located in the western and northern portion of the site which provides good access SW Tile Flat Road, an arterial street. The proposed neighborhood park is located within the Medium Density Residential areas, as are much of the community trail and the SW Tile Flat Road regional trail. The South Cooper Mountain area is not currently served by transit.

3.13.5 Establish High Density Residential areas to allow for a variety of housing types.

a) *Apply zoning districts as shown in subsection 3.14 Comprehensive Plan and Zoning District Matrix in areas with good access to arterial streets, transit service, commercial service, and public open space.*

Response: As demonstrated in Table 3, the proposed development includes 12.75 acres zoned for High Density residential areas, which are assigned to the R1 zoning district per subsection 3.14 and Table 2 of the South Cooper Mountain Community Plan. Development in the R1 zone will be reviewed through a separate Design Review process and is proposed to include between 216 and 275 units of multifamily housing.

C. CHAPTER 4 HOUSING ELEMENT

4.2.2 Availability of Housing Types

4.2.2.1 Provide an adequate variety of quality housing types to serve Beaverton's citizenry.

Response: The Scholls Heights at South Cooper Mountain subdivision proposes a wide variety of housing types, including detached single-family, attached single-family, and multifamily dwellings. See Sheets P3.0 through P3.7.

D. CHAPTER 5 PUBLIC FACILITIES AND SERVICES ELEMENT

More detailed responses regarding public facilities and services are provided in the responses to Section 40.03 Facilities Review Committee.

5.4 Storm Water and Drainage

5.4.1 Ensure long-term provision of adequate storm water management within existing City limits and areas to be annexed in the future.

- a) The City shall continue to participate in the CWS's Surface Water Management (SWM) program for the urban portion of the Tualatin River watershed. The City shall retain responsibility for planning, construction and maintenance of portions of the local storm water facilities within its incorporated limits.*
- b) On-site detention will be used as a storm water management tool to mitigate the impacts of increased storm water run-off associated with new land development.*
- c) All new land development will be connected to a storm water drainage system. Each new development will be responsible for the construction or assurance of construction of their portion of the major storm water run-off facilities that are identified by the SWM program as being necessary to serve the new land development.*

Response: The proposed development will provide on-site detention, and the development will be connected to the public storm water drainage system. The stormwater design and treatment systems will be designed consistent with Clean Water Services and City standards to mitigate the impacts of increased stormwater run-off associated with new land development.

5.5 Potable Water

5.5.1 The City shall continue to participate in the Joint Water Commission and work with the West Slope, Raleigh and Tualatin Valley Water Districts to ensure the provision of adequate water service to present and future customers in Beaverton.

- a) All new land development (residential subdivisions, multiple family dwelling development, and industrial and commercial developments) shall be connected to a public water system.*

Response: The proposed development will be connected to the City of Beaverton public water system.

- b) All new development served by the Beaverton Water Division shall be reviewed by the City to determine that the pressure of water available to serve the proposed development meets City standards.*

Response: The proposed development will meet the water pressure standards set by the City.

- c) The City shall encourage water conservation consistent with current intergovernmental agreements, to prolong existing supplies and to help postpone water system capacity improvements needed to supply expected future demands as a result of projected population increases.*

Response: The proposed project will incorporate water conservation practices throughout the development with the use of low flow fixtures and appliances and native plants for landscaping.

5.6 Sanitary Sewer

5.6.1. The City shall continue to cooperate with CWS to ensure long-term provision of an adequate sanitary sewer system within existing City limits and areas to be annexed in the future.

- a) All new land development (residential subdivisions, and multiple family dwelling, industrial, and commercial developments) shall be connected to the City sewer system.*
- b) When sewer service is extended into an area that contains existing development, all existing habitable buildings shall be connected to the new sewer if they are within 100 feet of the sewer line and if gravity lateral sewer lines can serve them.*

Response: The proposed development will be connected to the City of Beaverton sewer system.

5.8 Parks and Recreation

5.8.1 Cooperate with THPRD in implementation of its 20-Year Comprehensive Master Plan and Trails Master Plan in order to ensure adequate parks and recreation facilities and programs for current and future City residents.

Response: The proposed development includes a number of open spaces as well as trails intended to implement the South Cooper Mountain Community Plan.

The THPRD Comprehensive Master Plan and Trails Master Plan were adopted in 2006 and do not include the South Cooper Mountain plan area. THPRD adopted an updated Comprehensive Plan in July 2013 and a Trails Functional Plan in February 2016. These more recent plans include the South Cooper Mountain plan area.

The Trails Master Plan identifies the subject site as the location for two trails: Regional Trail R9 (South Cooper Loop Trail) and Community Trail C10.2 (South Cooper Mountain Trail #2). The proposed PUD includes a regional trail along SW Tile Flat Road (Trail R9) and a Community Trail along the western side of the natural area on site (Trail C10.2).

E. CHAPTER 6 TRANSPORTATION ELEMENT

Figure 6.2a: Planned Bicycle and Pedestrian Network

Response: This figure does not include the South Cooper Mountain plan area. Pedestrian and bicycle facilities and multi-use trails will be installed throughout the site as identified in the South Cooper Mountain Master Plan. Sidewalks are provided along all public streets; a north-south community trail is provided to the west of the stream on the site; a multi-use trail is provided parallel to SW Scholls Ferry Road; and a regional trail is provided parallel to SW Tile Flat Road. The proposed bicycle and pedestrian facilities are consistent with the South Cooper Mountain Community Plan.

Figure 6.4a: Functional Classification

Response: This figure does not include the South Cooper Mountain plan area. The proposed street network has been designed to implement the South Cooper Mountain Community Plan. The proposed north-south collector and proposed east-west neighborhood collector have been incorporated into the site design, as well as a number of local streets.

Figure 6.6a: Future Streets Where Right-of-Way is Planned for More than Two Lanes

Response: This figure does not include the South Cooper Mountain plan area. The proposed street network has been designed to implement the South Cooper Mountain Community Plan. None of the streets within the project are future streets; all streets will be constructed with development.

Figure 6.20: Local Connectivity Map

Response: This figure does not include the South Cooper Mountain plan area. The proposed street network has been designed to implement the South Cooper Mountain Community Plan. The street, pedestrian, and bicycle network has been designed to provide connectivity within the site and to adjacent sites.

6.2 Transportation Goals and Policies

6.2.1. Transportation facilities designed and constructed in a manner to enhance Beaverton's livability and meet federal, state, regional, and local requirements.

- a) *Maintain the livability of Beaverton through proper location and design of transportation facilities.*

Response: The local streets, neighborhood routes (including Strobel Road), and planned Collector Roads 6A and 8B will be designed in accordance with City of Beaverton design standards and the South Cooper Mountain Community Plan. The proposed development will complete the western side of SW Strobel Road, an existing private street, and extend SW Strobel Road to the northern site boundary. The north-south collector extends from the southeastern corner of the site to the northern boundary, and the east-west collector extends from SW Tile Flat Road on the west to the northeastern property boundary.

- d) *Locate and design multi-use paths to balance the needs of human use and enjoyment with resource preservation in areas identified on the Natural Resource Inventory Plan Map for their Significant Natural Resource values.*

Response: Three multi-use paths are planned within the project: an east-west multi-use path will follow SW Scholls Ferry Road; a north-south path is planned along the western edge of the natural resources that bisect the site; and a north-south path is planned along SW Tile Flat Road. Sidewalks are provided along all public streets, and bicycle lanes are provided along roads 6A and 8B. The paths, sidewalks, and bicycle lanes will be designed in accordance with City of Beaverton design standards and the South Cooper Mountain Community Plan.

- e) *Protect neighborhoods from excessive through traffic and travel speeds while providing reasonable access to and from residential areas. Build streets to minimize speeding.*

Response: The local streets, SW Strobel Road, neighborhood collector Street A, and planned collector roads 6A and 8B will be designed in accordance with City of Beaverton design standards and the South Cooper Mountain Community Plan.

6.2.2. *A balanced multimodal transportation system that provides mobility and accessibility for users.*

- c) *Develop and provide a safe, complete, attractive, efficient, and accessible system of pedestrian ways and bicycle ways, including bike lanes, cycletracks, bike boulevards, shared roadways, multi-use paths, and sidewalks according to the pedestrian and bicycle system maps, and the Development Code and Engineering Design Manual requirements.*

Response: Pedestrian and bicycle facilities (including sidewalks, bicycle lanes, and multi-use pathways) will be installed throughout the site and will meet City of Beaverton standards and comply with the South Cooper Mountain Community Plan.

- d) *Design sidewalks and the pedestrian access systems to City standards to enhance walkability: complete the accessible pedestrian network, provide safe direct access to transit and activity centers, and provide safe crossings at intersections with pedestrian friendly design.*

Response: The South Cooper Mountain Community Plan has identified a pedestrian and bicycle network for this area, which has been incorporated into the site design. The proposed development provides accessible pedestrian connections to SW Scholls Ferry Road, within the site, and to future developments to the north and east through a network of public sidewalks and multi-use pathways.

- e) *Provide connectivity to each area of the City for convenient multimodal access. Ensure pedestrian, bicycle, transit, and vehicle access to schools, parks, commercial, employment, and recreational areas, and destinations*

in station areas, regional and town centers by identifying and developing improvements that address connectivity needs.

Response: The South Cooper Mountain Community Plan identifies future pedestrian, bicycle, and vehicular connections, and the proposed project has been designed to conform with Figures 10 and 11 of the Plan. See below.

Figure 10: Community Plan Street Framework

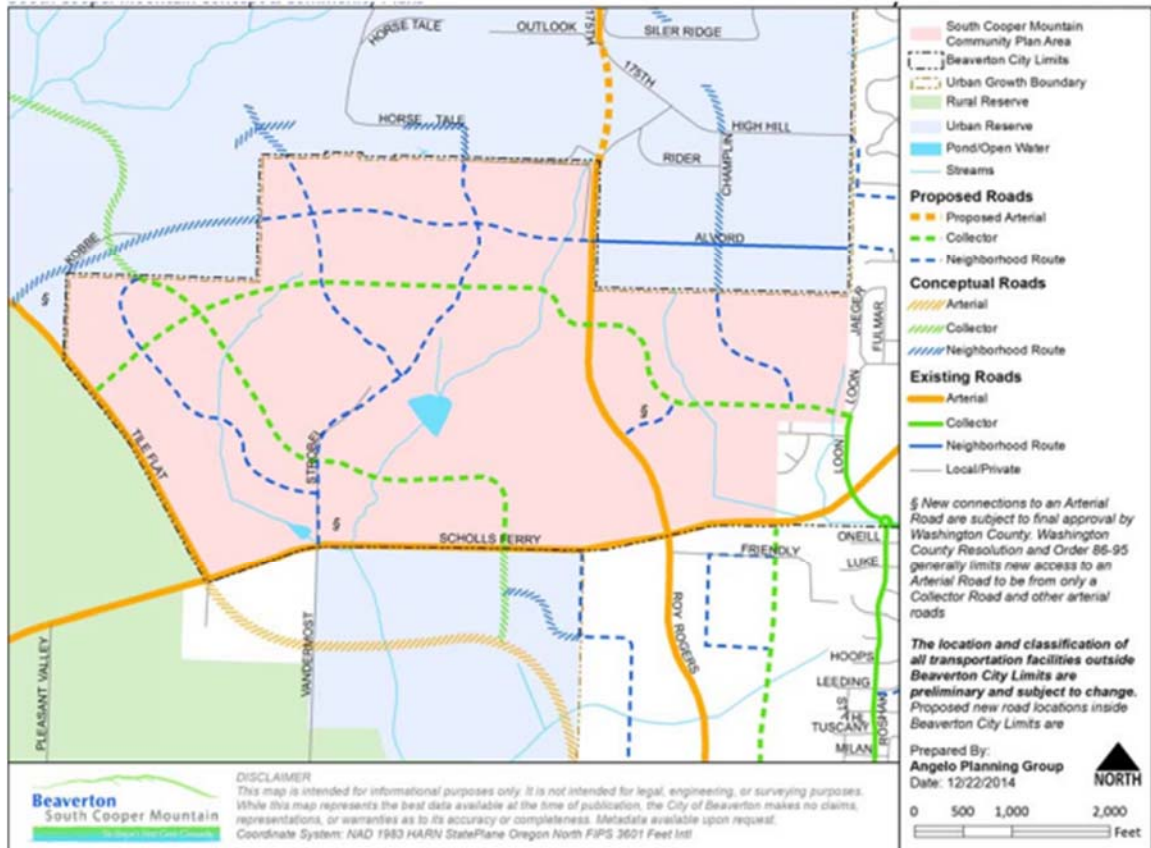
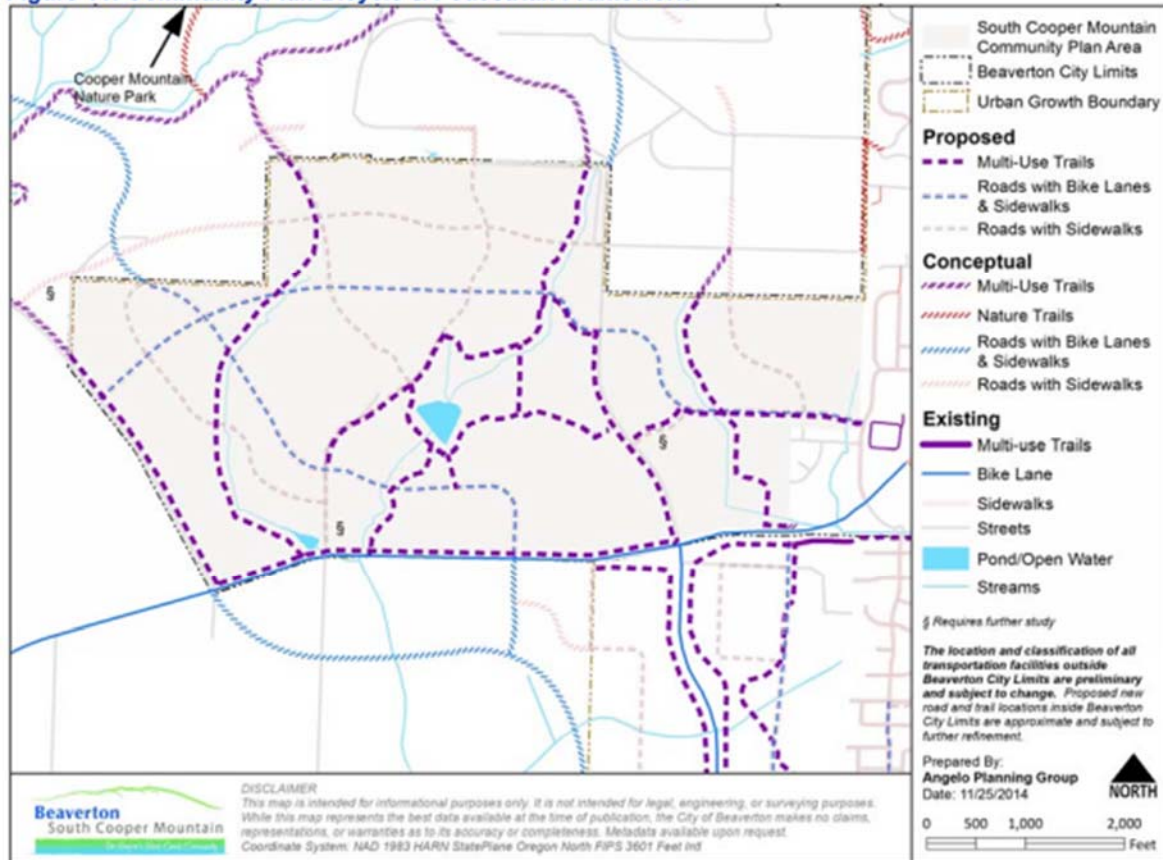


Figure 11: Community Plan Bicycle & Pedestrian Framework



- f) *Develop neighborhood and local connections to provide convenient circulation into and out of neighborhoods. Work to prevent and eliminate pedestrian and bicycle “cul-de-sacs” that require substantial out-of-direction travel for pedestrians and bicyclists.*

Response: The proposed site is designed to promote convenient circulation in and out of the neighborhood. Upon build-out of the planned north-south collector and east-west collector, a connected east-west route will provide connection between the subject site and the high school to the east, River Terrace to the south, and future neighborhoods to the northeast. Pedestrian and bicycle connections are provided through the development and are intended to connect to future facilities developed within the South Cooper Mountain area.

- g) *Identify specific areas within the City where pedestrian needs and the pedestrian experience should be given highest priority in the design of streets, parking, intersections, connectivity, signal controls, mapping and signing, and other transportation facilities.[...]*

Response: The proposed site is within and complies with the vision of the South Cooper Mountain Community Plan, which prioritizes multi-modal facilities. The Plan provides transportation strategies to guide the build-out of the area, including the strategy to “provide a great, but practical, pedestrian and bicycle network.” The local streets, neighborhood route, and collector roads will be designed in accordance to City of Beaverton design standards and the South Cooper Mountain Community Plan. Pedestrian and bicycle facilities will be installed throughout the site, in addition to the planned multi-use facilities per the South Cooper Mountain Community Plan.

- h) *The permanent closure of an existing road in a developed neighborhood is not recommended and will be considered by the City only under the following circumstances: as a measure of last resort, when the quality of*

life in the neighborhood is being severely threatened by excessive traffic volumes or the presence of a traffic safety hazard; or, as part of a plan reviewed through the City's land use, site development, and/or capital improvement process(es). Maintain existing neighborhood connectivity by avoiding closures of existing streets except when the closure is part of a larger plan for improvements to the neighborhood.[...]

Response: The proposed development does not propose the closure of any existing road.

i) Design streets to accommodate transit while minimizing impacts to traffic flow.

Response: The proposed streets implement the South Cooper Mountain Community Plan, which includes strategies to be transit-ready when transit is provided to the area in the future. The proposed development complies with this strategy by focusing the highest density at the southeast quadrant of the site in order support and access future transit service along SW Scholls Ferry Road.

j) Require developers to include pedestrian, bicycle, and transit-supportive improvements within proposed developments and adjacent rights-of-way in accordance with adopted policies and standards.

Response: The adopted South Cooper Mountain Community Plan identifies the type and location of pedestrian, bicycle, and transit-supportive improvements within the South Cooper Mountain area. The proposed improvements comply with Figure 11 of the Plan and City of Beaverton standards. Transit service does not currently serve the site; it is anticipated that future transit service will be focused on SW Scholls Ferry Road.

6.2.3 A safe transportation system.

b) Design streets to serve anticipated function and intended uses as determined by the Comprehensive Plan.

Response: The proposed street network had been designed in accordance with the City of Beaverton and South Cooper Mountain Community Plan standards, including pedestrian, bicycle, and multi-use facilities.

d) Designate safe walkway and bikeway routes from residential areas to schools, parks, transit, and other activity centers.

Response: Pedestrian and bicycle facilities will be installed throughout the site, in addition to the planned multi-use facilities per the South Cooper Mountain Community Plan. The proposed community trail along the western side of the natural resource area will connect the high-density area to the south with the neighborhood park and neighborhoods to the north. The planned trail will also connect with the SW Scholls Ferry Road multi-use path, which provides a direct off-road route to the new high school.

e) Construct multi-use paths only where they can be developed with satisfactory design components that address safety, security, maintainability, and acceptable uses. Multiuse paths should converge at traffic-controlled intersections to provide for safe crossing, and paths should be separate and distant from major streets for most of their length. Mid-block crossings for trails access, such as the Denney Road-Fanno Creek Trail crossing, will be considered as appropriate where findings for safety are met and such crossings are approved by the City.

Response: Multi-use paths are proposed along SW Scholls Ferry Road at the southern boundary of the site; along SW Tile Flat Road and the western boundary of the site, and adjacent to the

natural area on site. These locations were identified by the South Cooper Mountain Community Plan, and there is adequate area to design the paths to the identified cross-sections.

- f) Provide satisfactory levels of maintenance to the transportation system in order to preserve user safety, facility aesthetics, and the integrity of the system as a whole.*

Response: The transportation system will be designed in accordance with City of Beaverton standards and will be maintained by the City of Beaverton as public streets.

- g) Maintain access management standards for streets consistent with City, County, and State requirements to reduce conflicts among vehicles, trucks, rail, bicycles, and pedestrians. Preserve the functional integrity of the road system by limiting access per City standards.*

Response: The proposed streets are consistent with City of Beaverton and Washington County access standards.

- h) Ensure that adequate access for emergency services vehicles is provided throughout the City.*

Response: Tualatin Valley Fire and Rescue (TVF&R) requires two public access points for the site. The internal site street network will provide adequate access to the development.

6.2.5. Transportation facilities that serve and are accessible to all members of the community.

- a) Construct transportation facilities, including access to and within transit waiting areas, to meet the requirements of the Americans with Disabilities Act.*

Response: The proposed sidewalks will include access ramps at the corners to ensure full access. Transit service is not currently provided to the site and no transit facilities are proposed. The public sidewalks will be constructed to City of Beaverton standards and will comply with ADA standards.

F. CHAPTER 7 NATURAL, CULTURAL, HISTORIC, SCENIC, ENERGY AND GROUNDWATER RESOURCES ELEMENT

7.1 Overview

7.1.1 Balance Development Rights

- b) Where adverse impacts to Significant Natural Resources cannot be practicably avoided, require mitigation of the same resource type commensurate with the impact, at a location as close as possible to the impacted resource site.*

Response: The adopted South Cooper Mountain Annexation Area Local Wetland Inventory (LWI) identifies a stream and associated buffer areas on the site, as well as a “probable wetland” and “emergent wetland.” No locally significant wetlands have been identified on the site.

Impacts to the on-site stream and buffer are required to construct the planned collector roads and neighborhood route. The impacts will be mitigated on-site and will be consistent with Clean Water Service (CWS) and City of Beaverton requirements. The natural resources on the site will be placed in tracts for protection. See Appendix B.

Impacts to Significant Natural Resources have are addressed in more detail in response to the South Cooper Mountain Community Plan Policy 1 and Section 60.35.25.1.C (applicable South Cooper Mountain Community Plan policies).

- c) *Allow for relaxation of development standards to protect significant natural and historic resources. Such standards may include but are not limited to minimum setbacks, maximum building height, minimum street width, location of bicycle, pedestrian and multi-use paths, etc.*

Response: The Planned Unit Development process provides for flexibility of development standards to protect resources. Reductions to lot size and setbacks have been requested in order to cluster development to provide greater protection of significant natural resources while meeting the density targets of the South Cooper Mountain Community Plan.

7.3.1 Significant Natural Resources

7.3.1.1 Conserve, protect, enhance or restore the functions and values of inventoried Significant Natural Resources.

- a) *Inventoried natural resources shall be conserved, protected, enhanced or restored.*

Response: Natural resources on the site are identified in the South Cooper Mountain Community Plan Figure 12 and the February 2016 Local Wetland Inventory (LWI). A cultural resource assessment and CWS Natural Resource Assessment were completed for the site. The Wetland Delineation report is included as Impact Study A (Appendix A). The Natural Resource Assessment report identifies the wetlands and vegetated corridors inventoried for this project. No cultural resources were identified. Minimal impacts to the stream, small wetlands, and associated buffers will be required to construct the collector roads and neighborhood collector. Impacts to the wetland and buffers will be mitigated on-site per Clean Water Service's requirements at a 1:1 ratio or greater.

- b) *Conserve, protect and enhance natural resource sites and values through a combination of programs that involve development regulations, purchase of land and conservation easements, educational efforts, and mitigation of impacts on resource sites.*

Response: Impacts to the resource will be mitigated per CWS and City of Beaverton standards.

- c) *Inventoried natural resources shall be incorporated into the landscape design of development projects as part of a site development plan, recognizing them as amenities for residents and employees alike.*

Response: A multi-modal pathway is proposed along the tract vegetated corridor of the stream to allow views into the resource by residents. The neighborhood park is proposed to the west of the natural resource area to allow observation and enjoyment by park users.

- d) *The City shall rely on its site development permitting process as the mechanism to balance the needs of development with natural resource protection.*

Response: Compliance with natural resource protection requirements will be reviewed during Site Development permit review.

- e) *Development within Significant Natural Resource areas shall be consistent with the relevant regulations or guidelines of the National Marine Fisheries Service, U.S. Fish and Wildlife Service, Oregon Department of Fish and Wildlife, U.S. Army Corps of Engineers, Oregon Division of State Lands, Clean Water Services, and the Oregon Department of Environmental Quality.*

Response: The applicable regulations have been addressed within this narrative. A Service Provider Letter will be obtained from Clean Water Services. A DEQ 1200-C Erosion Control Permit will be required for work on the site, and a U.S. Army Corps of Engineers permit will likely be required for construction of the planned collector roads and neighborhood route

Compliance with applicable agency requirements will be reviewed during Site Development permit review.

- f) Specific uses of or development activities in Significant Natural Resources areas shall be evaluated carefully and those uses or activities that are complementary and compatible with resource protection shall be permitted. This is not intended to prohibit a land use permitted by the underlying zoning district but only to regulate the design of development such as building or parking location or type of landscaping.*

Response: Natural resources on the site are identified in the South Cooper Mountain Community Plan and the adopted Local Wetland Inventory. The significant natural resources on the site will be protected and enhanced. Limited encroachment into the natural areas is required to construct the collector roads and neighborhood route.

- g) Limited alteration or improvement of Significant Natural Resource areas may be permitted so long as potential losses are mitigated and “best management practices” are employed.*

Response: Natural resources on the site are identified in the South Cooper Mountain Community Plan and the adopted Local Wetland Inventory. The significant natural resources on the site will be protected and enhanced. Limited encroachment into the natural areas is required to construct the collector roads and neighborhood route.

- h) Roads and utilities, which must be located within, or traverse through, a Significant Natural Resource Area, shall be carefully planned and aligned so as to minimize loss and disruption. A rehabilitation or restoration plan shall be a necessary component. The City should allow variations from standard street sections in these areas.*

Response: The planned north-south collector, east-west collector, and neighborhood route are proposed along the alignment identified in the South Cooper Mountain Community Plan. Any permanent impacts will be mitigated and the resource will be enhanced. A mitigation /restoration plan will be prepared.

7.3.3 Significant Wetlands

7.3.1.1 Goal: Protect or enhance wetlands adopted as Significant Wetlands in the Local Wetland Inventory.

- a) Significant Wetlands in the Local Wetland Inventory shall be protected for their filtration, flood control, wildlife habitat, natural vegetation and other water resource values.*

Response: The February 2016 Local Wetland Inventory did not identify any locally significant wetlands on the site. This standard is not applicable.

- b) Development within the buffer area adjacent to a significant wetland shall be subject to restrictions on building, grading, excavation, placement of fill, and native vegetation removal.*

Response: The February 2016 Local Wetland Inventory did not identify any locally significant wetlands on the site. This standard is not applicable.

- c) Where development is constrained due to wetland protection regulations, a hardship variance may be granted if approval criteria are met.*

Response: No hardship variance is requested.

IV. COMPLIANCE WITH THE SOUTH COOPER MOUNTAIN COMMUNITY PLAN

Staff has identified the following relevant policies of the South Cooper Mountain Community Plan as applicable to this application.

A. LAND USE

Land Use Implementation Policies

- 1. The City shall adopt a Land Use Map as part of the Community Plan that establishes initial comprehensive plan map designations for the South Cooper Mountain Community Plan Area*

Response: Figure 7: Community Plan Land Use Map establishes Comprehensive Plan map designations for the South Cooper Mountain Community Plan area. A minor amendment to the land use boundaries for the site is requested with this application.

- 2. Washington County zoning, as administered by the City, shall remain in place until new City zoning is applied.*

Response: The site is currently zoned Washington County AF-20. Zoning in compliance with the South Cooper Mountain Community Plan land use designation is requested through this application.

- 3. Zoning may be applied through initiation by the City or as requested by an applicant. Zoning and development review applications may be requested concurrently. The mix of zones applied to a given development site shall be generally consistent with the assumed mix of zones shown in Table 2. Deviation of up to 10 percentage points may be allowed from the mix shown in Table 2 (e.g. if the mix shown is 30/70 then the deviation may be between 20/80 and 40/60). The percentage shall be calculated based on gross site acres.*

Response: The applicant has requested the application of zoning to the site. The zoning applicant has been submitted concurrently with Conditional Use, Replat, Preliminary Subdivision, Tree Plan 2, and Design Review 2 applications. The mix of zones applied to the site is generally consistent with the assumed mix of zones shown in Table 2. See Table 6 below.

Table 6. Demonstration of Consistency with SCMCP Table 2

Land Use Designation	Gross Site Area (Acres)	Net Residential Area (Acres)	Assumed Mix of Zones	Proposed Mix of Zones	Minimum Housing Capacity (Units)	Maximum Housing Capacity (Units)
High Density	12.75	6.50	100% R-1	100% R-1	282	555
Medium Density	28.98	11.42	30% R-2	28% R-2	248	631
	74.65	21.59	70% R-4	72% R-4	235	812
Standard Density	4.62	2.31	30% R-5	29% R-5	20	40
	11.15	6.59	70% R-7	71% R-7	41	69
TOTAL	132.15	48.41			826	2,107

- 4. Amendments to the boundaries of Land Use Map designations may be proposed as individual requests prior to development, or simultaneously when development is proposed. This policy is intended to provide a means for the Land Use map and zoning to be aligned with site-specific condition, and the placement of roads, housing densities, parks, schools and other development that will occur incrementally over time.*

Response: An amendment to the boundaries of the Land Use Map is requested to allow the land use designations to be aligned with the zoning and the placement of roads and housing

densities on the site.

5. *All Land Use map amendments will be required to demonstrate consistency with all policies in the South Community Plan in addition to applicable Comprehensive Plan policies, Development Code requirements, and other applicable regulations. In addition, amendments to the Land Use Map will provide a mix of land use designations and opportunities for a variety of housing types. The goal of this policy is to ensure that South Cooper Mountains' neighborhoods and livability are enhanced by variety in the type and design of housing.*

Response: An amendment to the boundaries of the Land Use Map has been requested. Consistency with the applicable policies, requirements, and regulations is addressed below.

6. *The City will support efforts by THPRD and Beaverton and Hillsboro School Districts to find, acquired and develop appropriate sites for neighborhood parks and elementary schools within the Community Plan area. The following location criteria shall guide the selection of appropriate sites:...*
 - a. *Neighborhood Park:*
 - i. *Two to four acres per neighborhood park of unconstrained, relatively level land for active recreation facilities*
 - ii. *Good frontage on a local street or Neighborhood Route with on-street parking*
 - iii. *Good connections to trails*
 - iv. *Focal points for neighborhoods, with walkable catchment areas*
 - v. *Co-location adjacent to a school is highly desirable*

Response: The South Cooper Mountain Community Plan identifies an appropriate location for a Neighborhood Park on the subject site. A 3.29-acre park is proposed. The park has frontage on a Neighborhood Route, which will provide on-street parking on both sides. The park is also adjacent to the proposed north-south community trail to the west of the vegetated corridor.

- b. *Elementary Schools:*
 - i. *Eight to ten acres of unconstrained, relatively level land per elementary school*
 - ii. *Good access from Neighborhood Routes or Collector roads*
 - iii. *Generally not adjacent to an arterial road*
 - iv. *Focal points for neighborhoods, centrally-located within walkable attendance areas*
 - v. *Opportunities to co-locate schools adjacent to parks should be sought*

Response: The South Cooper Mountain Community Plan identifies this site as a possible location of an elementary school. However, the Beaverton School District has not indicated an interest in or plans to locate an elementary school within the PUD. Therefore, no elementary school is proposed within this PUD.

Scholls Heights Elementary School is located east of the site on Loon Drive. The Beaverton School District notes that Scholls Heights Elementary is expected to be at 71% capacity in Fall 2016 and that there is sufficient capacity within the existing elementary schools to accommodate the estimated student generation from this site. See Appendix E.

B. NEIGHBORHOODS AND HOUSING

Neighborhood and Housing Policies

1. *Development shall contribute to creating walkable neighborhoods. This policy is implemented by demonstrating consistency with the neighborhood design principles listed below:*
 - a. *Clear focal points shall be provided. Focal points include but are not limited to: parks, schools, community gathering spaces, neighborhood services (i.e. day care), scenic viewpoints, and/or natural areas*

that are visually and physically accessible to the public. Residential developments shall provide at least one focal point per 40 acres of gross site area. The decision-making authority may require additional focal points or require provision of a focal point for smaller sites in order to ensure that all neighborhoods have at least one focal point or to ensure cohesiveness and legibility among adjacent developments.

Response: The site is 132.15 acres in size and three focal points are required. The regional and community trails, natural areas on site, neighborhood park, smaller pocket parks, and gathering spaces provide focal points for the proposed PUD. The proposed development includes the following:

- A 3.29-acre neighborhood park (Tract C11) is located west of the natural resource area within the residential areas and is both physically and visually accessible from surrounding homes, the community trail, and Streets A and H.
 - A stream and buffer area that extends from the southern to northern boundary of the site is visually accessible to the public by means of a community trail along the western edge.
 - Five fitness stations are located along the community trail.
 - Pocket parks are provided throughout the site, including Tracts NW7, E25, and NE2.
 - A dog park and community garden are proposed for Tract N9.
- b. A network of walkable blocks and trails, consistent with the Transportation Framework Plan and the Bicycle and Pedestrian Framework Plan, shall be provided.*

Response: As noted in the response to subsection a. above, a network of trails, sidewalks, and bike lanes have been proposed in compliance with Figure 11 of the South Cooper Mountain Community Plan. The transportation network was designed to respond to the natural features and topography of the site.

- c. The orientation of streets, blocks, development and/or trails shall be planned so that natural areas are not “walled off”, but rather are as physically and visually accessible to the public as practicable.*

Response: The natural areas on site are physically and visually accessible to the public from various common areas and the proposed trails and parks. Some lots will have rear yards abutting the proposed trails and natural areas, but there will be many points for public access.

- d. The provision of parks shall be coordinated with the Tualatin Hills Park and Recreation District.*

Response: The design of the multiuse trails follows the SCM Plan and THPRD Trails Master Plan alignment. The SCM Plan has identified the need for a neighborhood park in this portion of the South Cooper Mountain planning area, and the City and THPRD are coordinating to determine the timing and process for construction of the park.

2. *Residential developments shall provide a variety of housing types consistent with the permitted uses of applicable zone(s). The goal of this policy and implementing code standards is to ensure that, over time and multiple individual development reviews, South Cooper Mountain’s neighborhoods and livability are enhanced by variety in the type and design of housing in order to promote aesthetically pleasing residential neighborhoods as well as opportunities for people of varying incomes and life stages to live within the same neighborhood.*
- a. Residential developments in the South Cooper Mountain Community Plan area shall provide a variety of housing types, as identified below, for sites:*
- i. Up to 15-acres (gross), a minimum of one (1) housing type;*
 - ii. Greater than 15-acres and up to 30-acres (gross), a minimum of two (2) housing types;*

iii. *Greater than 30-acres (gross), a minimum of three (3) housing types.*

Response: The site is 132.15 gross acres in area and a minimum of 3 housing types is required.

b. *Housing Types include:[...]*

Response: The proposed PUD includes four housing types: single-family detached homes; attached alley/rear loaded townhomes; attached front loaded townhomes; and a future multifamily project that will include attached multifamily units. Sheets P3.0-P3.6 illustrate the locations of these housing types.

c. *For developments requiring more than one (1) housing type a minimum of 10 percent of the total dwelling units shall be of each housing type.*

Response: This proposal is required to provide three housing types. The proposal includes four housing types, each of which constitutes more than 10% of the project's share of housing. The proposed breakdown of percentage by housing type is shown in Table 7 below.

Table 7. Proposed Dwelling Unit Type

Housing Type	Number of Units	Percentage of Total
Standard Lot Single-Family	471	53%
Alley Loaded Townhomes	105	12%
Front Loaded Townhomes	100	11%
Multifamily	216	24%
TOTAL	892	100%

d. *For developments utilizing the Standard Lot Single Family housing type (Section 60.35.25.1.A.3.b.i.) and not utilizing the Small Lot Single Family housing type (Section 60.35.25.1.A.3.b.ii), the lot size for Standard Lot Single Family may range from 50 percent to 195 percent of the minimum land area per dwelling unit requirement of the underlying zoning district and it shall count as one housing type.*

Response: The proposal includes Standard Lot Single Family housing types and is not utilizing Small Lot Single Family Housing Types. The Standard Lot Single Family housing types are counted as one housing type.

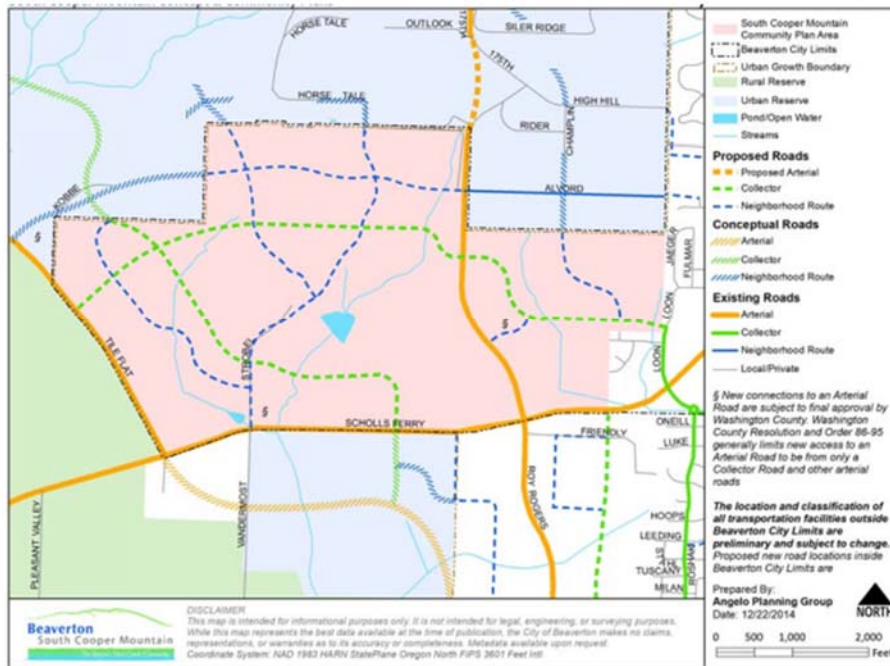
C. TRANSPORTATION

Figure 10: Community Plan Street Framework map.

Response: The proposed transportation network has been designed to be consistent with the connections illustrated in Figure 10. The proposal contains the three facilities identified for the site as shown on Figure 10:

1. The north-south Collector continuing west from SW Strobel Road to the northern plan area.
2. The east-west Collector connecting SW Tile Flat Road to the west with SW 175th Avenue and Loon Drive to the east.
3. The north-south Neighborhood Route connecting SW Strobel Road to the northern plan area.

Figure 10: Community Plan Street Framework



Source: South Cooper Mountain Community Plan

Street Policies

1. The streets planned for the Community Plan area are illustrated in Figure 10. The Beaverton Transportation System Plan and Washington County Transportation System Plans will be updated consistent with Figure 10 and will be the controlling documents for transportation planning.

Response: The proposed transportation network has been planned in accordance with Figure 10 and Comprehensive Plan Chapter 6 Transportation. Additionally, all streets have been designed in accordance with the City's EDM (with the exception of shed streets, which will be the subject of an EDM request) and are in compliance with the Comprehensive Plan.

5. The new north-south Neighborhood Collector road from SW Scholls Ferry Road through the Community Plan area is intended to provide connectivity through the Community Plan area.

Response: A portion of the new north-south Collector road is located on the site and is included in the proposed development as Road 8B.

6. North of SW Scholls Ferry Road, this new collector shall serve as the Main Street area of South Cooper Mountain. The Main Street section of this Collector road shall be designated as a Major Pedestrian Route. Pedestrian-oriented features appropriate to a Main Street and features that encourage cars to travel more slowly through the Main Street area should be emphasized in design of the road.

Response: The Main Street area of South Cooper Mountain is located to the east of the subject site. The proposed collector has been designed to City of Beaverton standards and will be extended to the east and south upon development of sites to the east.

7. The alignment of the North-South Collector shall account for, and not preclude, future extension to the west to SW Grabborn Road and south to serve Urban Reserve 6C.

Response: The proposed alignment of the north-south collector closely follows the alignment illustrated in Figure 10, and does not preclude future extension to the west or the south.

10. *In refining specific alignments for new roads identified on the Community Plan Street Framework map through the development review or project design process, impacts to natural resources shall be minimized to the extent possible while retaining key connections.*

Response: Three new roads within the subject site are identified on Figure 10: a north-south Neighborhood Route (Street A); a north-south Collector (Road 8B); and an east-west Collector (Road 6A). The roads are proposed to cross the stream and corridor on site in order to provide the connectivity envisioned by the Community Plan. Impacts to the on-site natural resources have been minimized to the extent possible, but are unavoidable if the connections are to be made.

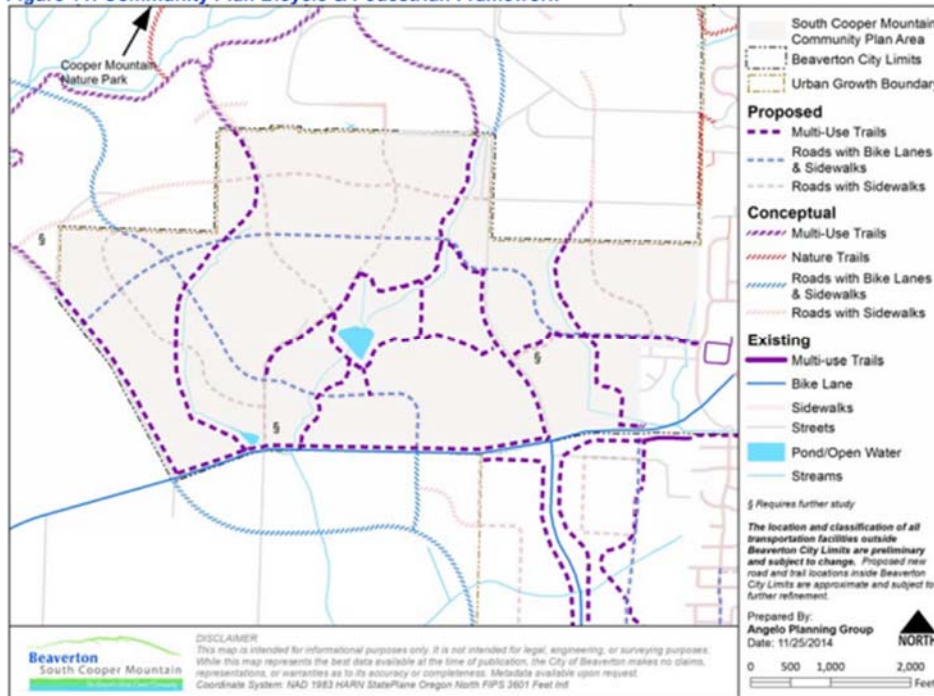
Bicycle and Pedestrian Framework Policies

Figure 11: Community Plan Bicycle and Pedestrian Framework map.

Response: The proposal contains the six facilities shown on the Figure 11 map as follows:

- Multi-Use trail running east-west, north of and parallel to SW Scholls Ferry Road
- Multi-Use trail running north-south east of and parallel to SW Tile Flat Road
- Multi-use trail running north-south along the stream and vegetated corridor on site
- Bicycle lanes and sidewalks on each side of the new north-south Collector
- Bicycle lanes and sidewalks on each side of the new east-west Collector
- Sidewalks along each side of the new north-south Neighborhood Route

Figure 11: Community Plan Bicycle & Pedestrian Framework



Source: South Cooper Mountain Community Plan

1. *Bicycle and Pedestrian Crossings: While the location and design of specific crossings points will be determined through further site-specific engineering evaluation, safe, protected pedestrian crossing opportunities should be provided near important pedestrian destinations, such as the future high school site, when a need is demonstrated and such crossings can be appropriately and safely designed and located, as determined by an engineering-level safety analysis.*

Response: The proposed PUD includes three trail crossings: at the intersection of Street A and Street P in the south; a mid-block crossing of Road 8B east of its intersection with Road 6A near the center of the site; and a mid-block crossing of Street A east of its intersection with Street GG in the northern portion of the site. The crossings of Roads 8B and 6A, collector roads, will be protected and provide median pedestrian refuges. See Sheet P0.4.

2. *Trails: Trails within the Community Plan area shall be provided as shown on Figure 11; however, the City may permit flexibility to adapt to site specific conditions and ownerships provided the conceptual network in Figure 11, or equivalent, is provided. The following principles shall provide guidance in the refinement of trail alignments within the Community Plan area:*

Response: The proposed PUD provides trails as shown in Figure 11. The proposal includes several trails as detailed below.

- a. *Stream Corridor Trails: Trails along stream corridors shall be built at the outer edge(s) of the vegetated corridors wherever possible, consistent with CWS standards. Such trails shall be designed to provide a recreational amenity and safe, pleasant pedestrian and/or bicycle connections between neighborhoods, as well as offering visual access to the resource area. Additional native vegetation shall be provided to either side of such trails wherever possible in order to enhance their value as wildlife corridors as well as transportation corridors.*

Response: A multi-use/community trail has been provided along the western edge of the vegetated corridor as identified in Figure 11. The trail will provide a recreational amenity for bicyclists and pedestrians, and will also include “fitness stations” for additional exercise options. The trail will provide connections between the River Terrace neighborhood to the south and the future North Cooper Mountain development area, as well as connections between the various neighborhoods within Scholls Heights and the planned neighborhood park and active spaces.

- b. *Trails through Resource Areas: The site specific design and location of providing trail connections across wetland resource areas within the Community Plan area shall be addressed on a case-by-case basis. There is a need to provide safe and convenient pedestrian and/or bicycle across the central natural resource area located north of the high school and Main Street. There is also a need to provide access to the River Terrace Trail south of SW Scholls Ferry Road. These, and other trails through resource areas, shall be designed to minimize impacts to the natural resources. Maintenance and enhancement of wildlife corridors and connections between resource areas should be considered when designing and locating trails.*

Response: As described in “a” above, a multi-use trail has been proposed along the western edge of the stream/buffer area identified in Figure 12. Figure 11 does not identify any trails through resource areas on the site, and the proposed trail is not designed to cross resource areas. All of these facilities have been incorporated into the proposed development plan, as demonstrated on Sheet P0.4.

- c. *School to School Trail: A multi-use path shall link from SW Loon Drive at Scholls Heights Elementary school to SW 175th Avenue at the planned high school site as shown in Figure 11 in order to provide safe routes to both schools and to connect neighborhoods to the east to the planned high school.*

Response: The School-to-School trail is not proposed to extend through the subject site.

- d. *Western Edge Trail: The community multi-use trail along the east side of SW Tile Flat Road within the Community Plan area shall be designed with trees and other landscaping to provide a visual buffer to*

adjacent rural lands. This trail shall be designed so that it can be extended further north, paralleling SW Grabhorn Road as far as Cooper Mountain Nature Park, when that portion of the Urban Reserve Area is brought into the UGB and developed.

Response: The proposed PUD abuts SW Tile Flat Road to the west and includes this trail, which has been designed to be 14 ft. in width with trees and other landscaping to provide a visual buffer to properties to the west. See Sheets L2.0, L2.3, and L2.6 for landscaping plans for the trail. The trail is designed for future extension to the north.

D. RESOURCE PROTECTION AND ENHANCEMENT

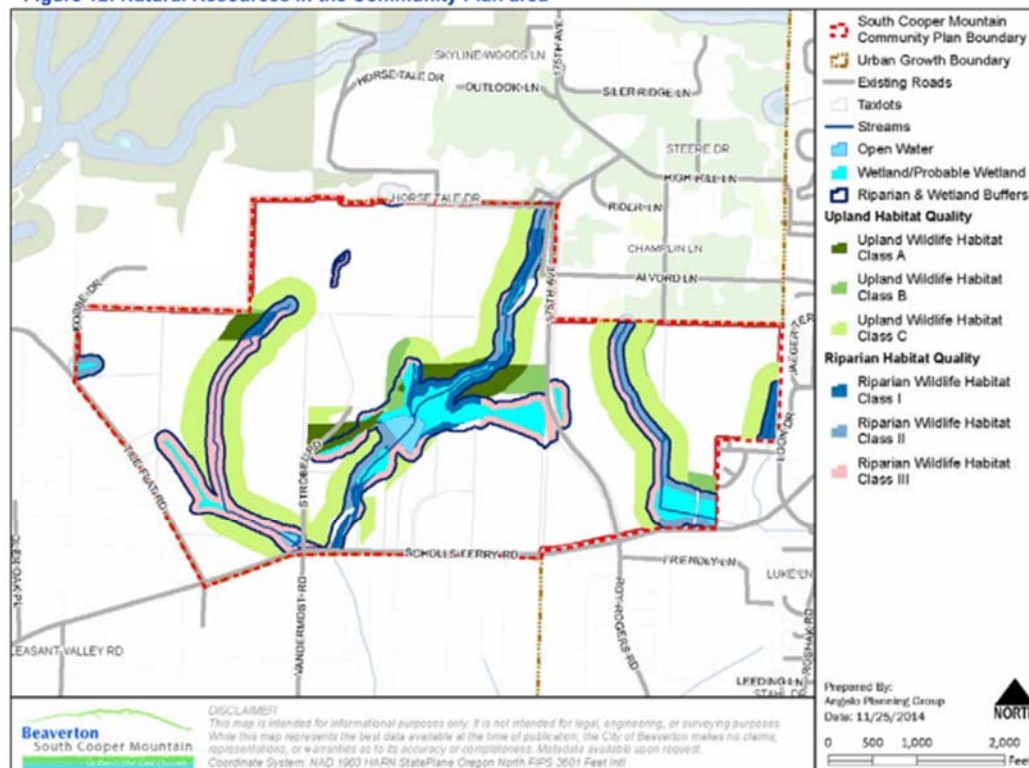
Significant Natural Resources & Open Space Edges

Response: Figure 12 below illustrates natural resources within the community plan area, and the adopted LWI provides additional information about the identified wetlands/probable wetlands. The site does not contain the central riparian/wetland area or the wetland area in the southeast corner of the plan area.

The following mapped resources are shown within the subject site:

- Wetland/Probable Wetland – these resources are further identified by the adopted LWI as:
 - Probable/Emergent Wetland PW-J
 - Wetland W-G
- Pond – this pond is further identified by the adopted LWI as Open Water OW-2
- Streams – this stream is further identified by the adopted LWI as Tualatin River Tributary TR-1a
- Riparian Wildlife Habitat Class I, II, and III
- Upland Wildlife Habit Class A and C
- Riparian & Wetland Buffers

Figure 12: Natural Resources in the Community Plan area



Source: South Cooper Mountain Community Plan.

Wetland W-G is not identified by the LWI as a “locally significant wetland” and is not subject to the policies of this chapter.

Natural Resource Policies

1. *Locally significant wetlands and protected riparian corridors within the Community Plan area shall be protected and enhanced, consistent with local, state, and federal regulations.*

Response: The Applicant proposes to develop additional land in the South Cooper Mountain Plan area. The project is known as the Scholls Heights at South Cooper Mountain PUD. The applicant conducted a pre-application meeting with City staff on October 5, 2016. The pre-application notes (attached as Appendix A) list Plan Natural Resource Policy 1 as a relevant approval criterion.

AKS Engineering has conducted the required wetland delineation and all of the identified wetlands are below the 0.5-acre threshold at which the LWI identified the need for an OFWAM functional assessment (see Impact Study A for the Natural Resources Assessment, including a discussion of significance and the wetland delineation).

The protected riparian corridors on the site include Class I, II, and III Riparian Wildlife Habitat and associated riparian corridors; Class III habitat is not required to be protected. Though protected upland habitat is not included in this policy statement, the site contains Class A and C Upland Wildlife Habitat Areas. Class C habitat is not required to be protected.

2. *Development adjacent to significant natural resource areas shall be designed to provide visual and/or physical access to the resource and limit continuous rear lot line edges abutting a significant natural resource through one or more of the following treatments of the open space edge.*
 - a. *parallel trail along the edge of the vegetated corridor with access points from adjacent roads and community focal points;*

Response: The proposed multi-use trail parallels the western edge of the vegetated corridor and can be accessed from SW Scholls Ferry Road, Street A, Road 8B, and Road 6A.

Community focal points include the proposed neighborhood park, the on-site natural areas weaving through the site, and a number of pocket parks throughout the site. The park is located to the west of the trail and is visually and physically accessible by the trail, and the on-site natural areas are adjacent to the trail and visually accessible from the trail. See Sheet L1.0 for the locations and type of focal points proposed.

- b. *local streets that run adjacent to the edge of the vegetated corridor, without development between the street and the vegetated corridor; or*

Response: This treatment is not proposed.

- c. *neighborhood parks, pocket parks, schools and similar uses that connect to the resource area and provide breaks between developed areas abutting the resource.*

Response: The resource areas are connected by the proposed multi-use trail, which abuts the proposed neighborhood park and several passive open space areas to the west and east of the resource area. These spaces provide a visual break between the developed areas abutting the resource.

E. URBAN FORESTRY MANAGEMENT

Urban Forestry Policies

2. *Tree Planting: Tree planting already required by City regulations (e.g. landscaped areas, street trees) shall be maximized as a method to increase the tree canopy in the Community Plan area.*

Response: Trees and vegetation will be addressed in accordance with Section 40.90. Existing trees will be protected with a 5 foot tall fence around the drip line during construction. Neither topsoil storage nor construction materials will be located within the drip line of the trees. All tree protection fences will be placed in accordance with code standards to protect tree roots. Street trees will be provided per City requirements, and landscaped areas will include trees. Sheets L2.0-L2.7 include the preliminary landscape plan, which identifies locations for tree planting. Sheets LTP-1-LTP-7 provide tree protection and tree species detail.

3. *Regionally Significant Upland Habitat within the SCM Community Plan area shall be protected through application of the City's existing tree protection standards and incentives for Habitat Benefit Area preservation, as appropriate.*

Response: Figure 12 identifies Regionally Significant Upland Habitat Class A and C on the site. Upland Habitat Class A area is considered a Significant Natural Resource Area (SNRA) and the regulations of Section 40.90.15.2 are applicable and addressed in the responses to that section.

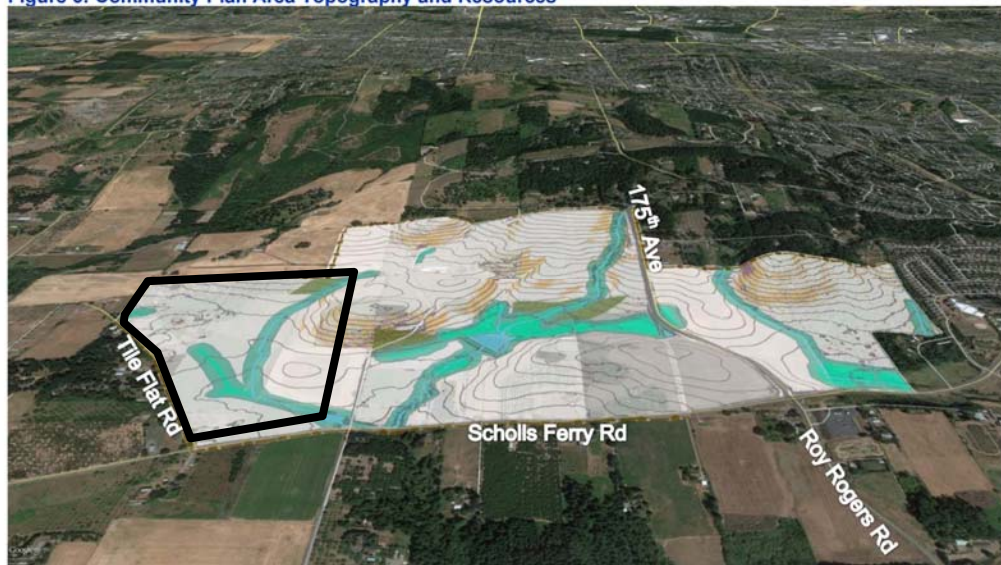
F. SCENIC VIEWS

Scenic Views Policies

1. *The city will encourage protection of view corridors for the enjoyment of adjacent neighborhoods and the broader community on lands that currently offer views of the Chebalem Ridge. Viewpoints should provide seating and space for passerby and should provide for the permanent protection of the view through measures such as easements. Techniques for view corridor preservation may include:*
 - a. *Streets that "T, stub, or curve at a location offering a viewpoint, with a break between buildings;*
 - b. *Neighborhood or pocket parks situated to offer a viewpoint;*
 - c. *Gaps between buildings with small seating areas adjacent to the sidewalk; and/or*
 - d. *Limitations on building heights down-slope from a viewpoint.*

Response: As shown in Figure 6 of the SCM Community Plan (below), the site contains a portion of one of four "high points" in the SCM area.

Figure 6: Community Plan Area Topography and Resources



The site slopes generally from northwest to southwest, with slopes in some areas exceeding 20%. The proposed PUD includes several curvilinear streets that offer viewpoints. Proposed open space tracts are located throughout the site to provide views to the south, west, and east. The proposed neighborhood park is located in the center of the site and will provide views to the south and southwest. Tract N9 and the community trail will provide views along the riparian corridor to the south. Tracts NE6, C6, C5, and C4 provide views to the west. See Sheet L1.0 for proposed park locations and viewsheds.

The project site slopes to the south, which minimizes the potential view impacts from homes constructed downslope. The proposed Western Trail along SW Tile Flat Road, the Regional Trail along SW Scholls Ferry Road, and the proposed community/multi-use trail along the western edge of the resource area on site provide opportunities for views along the length of the site.

G. RURAL EDGES AND TRANSITIONS

Rural Edges and Transitions Policies

1. *SW Tile Flat Road Landscape Buffer. Require that development abutting SW Tile Flat Road provide a landscaped buffer with trees and shrubs that provide a visual screen for adjacent rural uses.*

Response: The proposed PUD abuts SW Tile Flat Road, and this policy is applicable. The proposal includes a 14-ft. multi-use trail parallel with SW Tile Flat Road, and a 7.5-ft. landscaped buffer with trees and shrubs that provides a visual screen between the proposed homes and the adjacent rural uses to the west. See Sheet P0.2 SW Tile Flat Road detail for details of the proposed trail, and Sheets L2.0, L2.3, and L2.6 for proposed landscaping.

H. INFRASTRUCTURE PROVISION

Infrastructure Policies

1. *Urban development not allowed without urban services.*

Response: The proposed PUD will construct required infrastructure.

7. *Alignment for new water and sewer. In identifying specific alignments for new water and sewer infrastructure, impacts to natural resources shall be avoided or minimized to the extent possible.*

Response: The proposed water and sewer alignments are located within existing and proposed public rights-of-way in order to minimize impacts to natural resources. See Sheets P5.- P5.6 for preliminary utility plans.

V. COMPLIANCE WITH CHAPTER 20 LAND USES

A. 20.05. RESIDENTIAL LAND USE DISTRICTS

20.05.15. Site Development Standards.

Response: The table at Subsection 20.05.15 provides Site Development Standards for the residential zoning districts. The proposed subdivision is designed to contain lots with the zoning designations R1, R2, R4, R5, and R7. Compliance with the standards of 20.05.15.A-C is demonstrated in Table 8 below. The site is larger than 2 acres and D-E are not applicable.

Table 8. Compliance with Land Area Requirements

Zone	R1	R2	R4	R5	R7	Comments
A. Minimum Land Area (sq. ft.)	1,000	2,000	4,000	5,000	7,000	
Large Lot Proposed Land Area (sq. ft.)	555,542	115,307-581,082	435,562-927,087	201,082	382,715	
PUD Proposed Land Area (sq. ft.)	374,986	1,223 – 124,470	2,006-122,986	2,955-6,228	3,579 – 9,192	An adjustment to minimum lot sizes has been requested through the PUD process

Required setbacks for each home type are detailed in Table 20.05.15.A-C. Adjustments to the setback and building height requirements of this section have been requested through the Planned Development provisions and are addressed in the responses to that section.

20.05.20. Land Uses

The following Land Uses are classified in the following three categories: Permitted (P) including their accessory uses and structures, Conditional Uses (C), or Prohibited (N) uses as identified in the table below for Residential Zoning Districts. All superscript notations refer to applicable Use Restrictions Section 20.05.25. [ORD 4584; June 2012].

Response: Section 20.05.20 specifies that Planned Unit Developments are conditionally permitted and dwelling units are permitted uses in each of the proposed zoning categories. The proposed development includes detached single-family dwelling units in the R4, R5, and R7 zones, and attached single-family dwelling units (townhomes) in the R2 zone. No compact housing or other uses are proposed.

20.05.25. Use Restrictions

The following Use Restrictions refer to superscripts found in Section 20.05.20.

11. A Conditional Use Permit-Planned Unit Development pursuant to 40.15.15.4 shall be required for residential development of a site equal to or greater than 10 acres and located within the boundary of the South Cooper Mountain Community Plan Area.

Response: The subject site is greater than 10 acres in size and located within the boundary of the South Cooper Mountain Community Plan Area, and a Conditional Use Permit – Planned Unit Development is required. Compliance with the applicable criteria of 40.15.15.4 is described below.

20.25 Density Calculations

20.25.05. Minimum Residential Density.

A. *New residential development in all Residential, Commercial, and Multiple Use districts which permit residential development must achieve at least the minimum density for the zoning district in which they are located. Projects proposed at less than the minimum density must demonstrate on a site plan or other means, how, in all aspects, future intensification of the site to the minimum density or greater can be achieved without an adjustment or variance. If meeting the minimum density will require the submission and approval of an adjustment or variance application(s) above and beyond application(s) for adding new primary dwellings or land division of property, meeting minimum density shall not be required. [...]*

Minimum residential density is calculated as follows:

1. *Refer to the definition of Acreage, Net. Multiply the net acreage by 0.80.*
2. *Divide the resulting number in step 1 by the minimum land area required per dwelling for the applicable zoning district to determine the minimum number of dwellings that must be built on the site.*
3. *If the resulting number in step 2 is not a whole number, the number is rounded to the nearest whole number as follows: If the decimal is equal to or greater than 0.5, then the number is rounded up to the nearest whole number. If the decimal is less than 0.5, then the number is rounded down to the nearest whole number.*

Response: Tables 9 and 10 below demonstrate that the application is compliant with the minimum density standards for each requested comprehensive plan category and implementing zoning designation.

Table 9. Determination of Net Acreage

Land Use Designation	Proposed Zoning	Gross Site Area (ac)	ROW (ac)	Open Space Tracts (ac)	Stormwater Tracts (ac)	Resource Tracts (ac)	Net Acres	Net-Net Acres (Net x 0.8)
High Density	R-1	12.75	1.32	0.00	0.49	2.82	8.12	6.50
Medium Density	R-2	28.98	4.56	5.37	1.48	3.30	14.28	11.42
	R-4	74.65	29.45	5.76	5.67	6.79	26.98	21.59
Standard Density	R-5	4.62	1.18	0.20	0.00	0.00	2.89	2.31
	R7	11.15	2.79	0.46	0.00	0.00	8.24	6.59
TOTAL		132.15	39.30	11.78	7.64	12.92	60.51	48.41

Table 10. Proposed Residential Densities

Land Use Designation	Proposed Zoning	Net Acres (per Table 9)	Maximum Density (Units)	Open Space Tracts (ac)	Minimum Density (Units)	Proposed Dwelling Units
High Density	R-1	6.50	555	0.00	282	216
Medium Density	R-2	11.42	631	5.37	248	255
	R-4	21.59	812	5.76	235	317
Standard Density	R-5	2.31	40	0.20	20	29
	R-7	6.59	69	0.46	41	75
TOTAL		48.41	2107	11.78	826	892

B. *Residential Density Averaging. Within a single land use zone, residential densities may be averaged across a property in order to allow for a variety of housing types, provided that the property is within a single, contiguous ownership, except that within a PUD may be averaged across multiple land use zones provided*

that the applicant demonstrates that the proposed development is compatible with existing and planned development on neighboring parcels. For the purposes of this standard, properties within a single, contiguous ownership also include those properties separated only by a street.

Response: As permitted within a PUD, this application averages residential densities across multiple zones on the site. The proposed density of the R-1 zone is 216 to 275 dwelling units, which is between 66 and 9 units less than the minimum density of 282 units; and the proposed density of the R-2 zone is 255 dwelling units, which is 7 units more than the minimum density of 248 dwelling units. However, the proposed densities for the R4, R5, and R7 zones exceed the minimum densities by 125 units, and the site exceeds the overall minimum density requirement by 66 units.

C. *South Cooper Mountain Community Plan. Within the South Cooper Mountain Community Plan Table 2: Land Use Designations and Capacity Estimates outlines the density capacity expectations for development of land within the South Cooper Mountain Community Plan Area. The Land Use Implementation Policies of the Community Plan include policies that outline application of zoning and deviations from the capacity estimates of Table 2.*

Response: South Cooper Mountain Community Plan Table 2 is included below for reference.

Table 2: Land Use Designations and Capacity Estimates

Land Use Designation	Gross Acres ¹⁷	Gross Residential Acres ¹⁸	Net Residential Acres ¹⁹	Assumed Mix of Zones	Estimated Housing Capacity (units) ²⁰	Minimum Housing Capacity (units) ²¹
High Density	109	59	27	100% R-1	1,090	950
Medium Density	237	221	128	30% R-2 70% R-4	1,810	1,450
Standard Density	170	159	89	30% R-5 70% R-7	620	500
Main Street	9	0	0	100% NS	N/A	N/A
Total	525	438	245		3,530	2,900

Table 11 below demonstrates compliance with the assumed density mix from Table 2. The policy allows for deviations of up to 10% within any category. As demonstrated below, the proposed development proposes a deviation of 2% in the Medium Density category and 1% in the Standard Density category, within the 10% allowable deviation.

Table 11. Demonstration of Consistency with SCMCP Table 2

Land Use Designation	Gross Site Area (Acres)	Net Residential Area (Acres)	Assumed Mix of Zones	Proposed Mix of Zones	Minimum Housing Capacity (Units)	Maximum Housing Capacity (Units)
High Density	12.75	6.50	100% R-1	100% R-1	282	555
Medium Density	28.98	11.42	30% R-2	28% R-2	248	631
	74.65	21.59	70% R-4	72% R-4	235	812
Standard Density	4.62	2.31	30% R-5	29% R-5	20	40
	11.15	6.59	70% R-7	71% R-7	41	69
TOTAL	132.15	48.41			826	2,107

VI. COMPLIANCE WITH CHAPTER 40 APPLICATIONS

A. 40.03. FACILITIES REVIEW COMMITTEE

Consistent with Section 10.95.4. (Facilities Review Committee) of this Code, the Facilities Review Committee shall review the following Type 2 and Type 3 land use applications: all Conditional Use, Design Review Two, Design Review Three, Public Transportation Facility Reviews, Street Vacations, and applicable Land Divisions. Applicable land division applications are Replats, Partitions, Subdivisions, Fee Ownership Partitions, and Fee Ownership Subdivisions. In making a recommendation on an application to the decision making authority, the Facilities Review Committee shall base its recommendation on a determination of whether the application satisfies all the following technical criteria. The applicant for development must establish that the application complies with all relevant standards in conformance with Section 50.25.1.B., and all the following criteria have been met, as applicable.

Response: The proposal is for Conditional Use, Design Review, and Subdivision applications and is subject to this chapter.

A. All critical facilities and services related to the proposed development have, or can be improved to have, adequate capacity to serve the proposed development at the time of its completion.

Response: Chapter 90 of the Development Code defines “critical facilities” to be services that include public water, public sanitary sewer, storm water drainage and retention, transportation, and fire protection.

Necessary critical facilities and services to the large lot subdivision will be provided by The Ridge at South Cooper Mountain to the east. The applicant understands the risk of relying on approved land use entitlements to show that critical facilities can be feasibly provided at the time of land use development and the applicant understood that all necessary critical facility easements must be acquired prior to site development permit issuance or plat recording for the large lot subdivision and, should an adjacent developer or property owner not consent to the easement, there may be delays to the project while the applicant is acquiring easements privately.

Critical facilities and services to the PUD are either in place or will be at the time of completion of development, as described below and shown in Sheets P5.1 to P5.6.

Public Water

Public water supply for the site will be provided by the City of Beaverton. Water lines will be constructed within the proposed rights-of-way within the development. In accordance with the South Cooper Mountain Water Master Plan amendment, a 24-in. public waterline is to be extended from the existing stub at the west side of the Beaverton School District high school project to the west along the proposed east-west collector (Road 8B). The existing Ridge at South Cooper Mountain land use application proposes an extension of the 24-in. waterline to SW Strobel Road, where it will be extended further west into the Scholls Heights at South Cooper Mountain project. In addition, waterlines will be stubbed to boundary of the property for future extensions/connections per the Water Master Plan.

Public Sanitary Sewer

Public sanitary sewer for the site will be provided by the City of Beaverton, and will extend from the existing CWS sanitary sewer manhole in Scholls Ferry Road and be routed through the proposed Ridge at South Cooper Mountain to provide a 24-in. stub at SW Strobel Road, north of Scholls Ferry Road, for extension to service the majority of the Scholls Heights at South Cooper Mountain project.

There is a portion of the Scholls Heights at South Cooper Mountain project at the corner of Scholls Ferry Road and Tile Flat Road that will be extended in Scholls Ferry Road to connect into the existing CWS sanitary sewer manhole in Scholls Ferry Road. This 8-in. sanitary sewer extension will mainly provide service to the proposed high density/multifamily portion of the Scholls Heights development and will require design coordination with the existing Scholls Ferry Road culvert crossings and future WWPS waterline project to avoid future conflicts. In addition, sanitary will be stubbed to boundary of the property for future extensions/connections per the Sanitary Sewer Master Plan.

Stormwater Drainage, Treatment, and Detention

Storm water management facilities will be located throughout the Scholls Heights at South Cooper Mountain development to provide storm water management (quantity and quality) in accordance with South Cooper Mountain Community Plan storm water requirements (per the City, this requires meeting City of Beaverton and SLOPES V stormwater design standards). Facilities will be located based on topography, drainage basins, proposed phasing, and design coordination with open space/parks/trails. Outfalls will be to the existing north-south drainage way that will outfall to new culvert crossing at Scholls Ferry Road.

A Preliminary Utility Plan is included as Sheets P5.1 through P5.6, and a preliminary stormwater management plan is included as Impact Study C.

Transportation

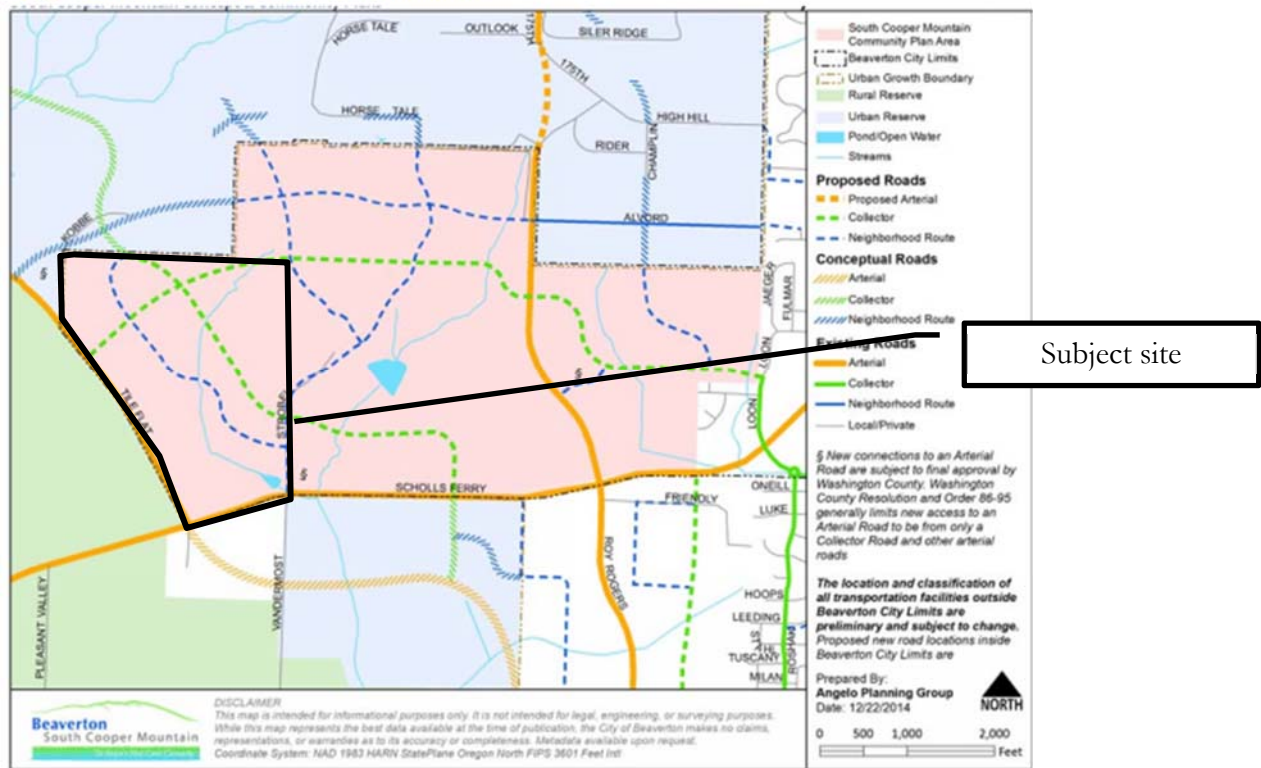
Sheet P0.2 illustrates proposed street cross sections for all of the proposed streets internal to the Scholls Heights at South Cooper Mountain PUD.

Access to the site is proposed to be from five new access points from SW Strobel Road and two new access points from SW Tile Flat Road. A Traffic Impact Analysis (TIA) completed by Kittelson & Associates, Inc. is included as Impact Study E. The TIA indicates that the new PUD will generate 8,558 total trips and assumes up to 275 multifamily units in the South phase. Specifics of the TIA and trip calculations are addressed below.

Figure 10: Street Framework of the South Cooper Mountain Community Plan (see below) identifies the street and circulation framework for the South Cooper Mountain area. The site includes two proposed collectors (the north-south and east-west collectors); a proposed neighborhood route within the site; a proposed neighborhood route that follows the alignment of the existing SW Strobel Road; an arterial (SW Scholls Ferry Road) to the south of the site; and an arterial (SW Tile Flat Road) to the west of the site.

The PUD includes a new north-south collector street, Road 8B, which continues the collector alignment from The Ridge at South Cooper Mountain to the east; a new east-west collector street, Road 6A; a new neighborhood route, Street A, that connects the southeastern and northwestern areas of the site; dedication of right-of-way and construction of the western portion of SW Strobel Road to neighborhood route standards; dedication of right-of-way and construction of the northern portion of SW Scholls Ferry Road to Washington County arterial standards; and dedication of right-of-way and construction of the eastern portion of SW Tile Flat Road to Washington County arterial standards. No direct vehicular access to SW Scholls Ferry Road is proposed, and two vehicular access points (Street K and Road 6A) are proposed to SW Tile Flat Road. The applicant is coordinating with Washington County regarding the proposed Street K access. All streets within the site are designed to continue with development of adjacent sites. See Sheet P0.4 for details.

Figure 10: Community Plan Street Framework



As described by the South Cooper Mountain Community Plan, a network of local streets will be developed through the site. Local through streets within the subdivision will be developed to the City of Beaverton L1 and L2 standards and will include between 52 and 58 ft. of right-of-way, pavement width of 28 to 34 ft., curbs, planter strips, sidewalks, street trees, and other street improvements. Parking will be allowed on at least one side of all local streets.

Fire Protection

Fire protection will be provided to the site by Tualatin Valley Fire and Rescue Department (TVF&R). Fire hydrants will be installed as directed by City of Beaverton and the Tualatin Valley Fire and Rescue District.

- B. *Essential facilities and services related to the proposed development are available, or can be made available, with adequate capacity to serve the development prior to its occupancy. In lieu of providing essential facilities and services, a specific plan may be approved if it adequately demonstrates that essential facilities, services, or both will be provided to serve the proposed development within five (5) years of occupancy.*

Response: Chapter 90 of the Development Code defines “essential facilities” to be services that include schools, transit improvements, police protection, and pedestrian and bicycle facilities in the public right-of-way. Essential facilities and services are either in place or will be at the time of completion of development as described below.

Police Protection

The site will be served by the City of Beaverton Police Department.

Schools

The site is located within the Beaverton School District (BSD) and will be served by Scholls Heights Elementary School at 16400 SW Loon Drive; Conestoga Middle School at 12250 SW

Conestoga Drive; and the Mountainside High School being constructed at 12500 SW 175th Avenue and expected to open for the 2017-2018 school year.

Per the service provider letter dated April 28, 2017, the Beaverton School District has provided comments addressing the anticipated impacts of the subject project to the District. In summarizing their comments, the District has indicated that the proposal will result in a moderate impact to schools in the area and anticipates sufficient capacity to accommodate new students from the proposed PUD project.

Transit Improvements

The site is not currently served by transit, and no transit facilities are proposed within the planned development. The nearest TriMet bus line is Route 92, the South Beaverton Express, which stops at the intersection of SW Scholls Ferry Road/SW Teal Boulevard/SW Horizon Boulevard. The standards of this section are not applicable.

Pedestrian and Bicycle Facilities in the Public Right-of-Way

The applicant will dedicate sufficient right-of-way to accommodate the desired 5-lane arterial cross-section for SW Scholls Ferry Road; the desired 3-lane arterial cross-section for SW Tile Flat Road; the desired 2-lane neighborhood route cross-section for SW Strobel Road and Street A; and the desired 3-lane collector cross-sections for Roads 8B and 6A. The circulation network was planned in accordance with the South Cooper Mountain Community Plan, and all streets are designed in accordance with the City of Beaverton's Engineering Design Manual (EDM) with the exception of Tract E26. A Sidewalk Modification Request is included in this application.

The proposed PUD includes the Community Trails illustrated in Figure ES-5 of the South Cooper Mountain Community Plan. The multimodal South Cooper Loop trail is proposed along the southern boundary of the site from the eastern property line west to SW Tile Flat Road. A north-south community trail will follow the stream on site and terminate at the northern property line for future connection to the north.

The new arterial cross-sections and collector streets includes bike lanes and sidewalks, and connects to a new multi-use trail heading north along SW Tile Flat Road from its intersection with SW Scholls Ferry Road.

C. The proposed development is consistent with all applicable provisions of Chapter 20 (Land Uses) unless the applicable provisions are modified by means of one or more applications which shall be already approved or which shall be considered concurrently with the subject application; provided, however, if the approval of the proposed development is contingent upon one or more additional applications, and the same is not approved, then the proposed development must comply with all applicable provisions of Chapter 20 (Land Uses).

Response: The proposed development is consistent with all applicable provisions of Chapter 20 as adjusted through the Planned Unit Development process and through the provisions of 40.30. Compliance with Chapter 20 is addressed in Section V of this narrative, and the Planned Unit Development process is addressed under 40.15 and 60.35.

D. The proposed development is consistent with all applicable provisions of Chapter 60 (Special Requirements) and all improvements, dedications, or both, as required by the applicable provisions of Chapter 60 (Special Requirements), are provided or can be provided in rough proportion to the identified impact(s) of the proposed development.

Response: Relevant provisions related to this chapter include Section 60.30 Off-Street Parking and Section 60.55 Transportation Facilities.

Off-Street Parking (Section 60.30)

According to this section, detached dwellings require 1 off-street parking space per unit. Each proposed unit will have at least 1 off-street parking space. Attached dwellings units (townhomes) require 1.25 to 1.75 spaces per unit, depending on the number of bedrooms. Each detached unit will have 2-car garages and driveway spaces for 1 or 2 cars, and all attached units will have 1-car garages and driveway spaces for 1 or 2 cars, for a total of 2-3 spaces per attached dwelling. Bicycle parking for the dwellings is provided within each individual unit. See Table 12 and Sheet P3.0 for details.

Table 12. Compliance with off-street parking requirements

Residential Use Category	Required Ratio Per Unit	Proposed Ratio Per Unit	Proposed Units	Required Spaces	Proposed Spaces
Detached dwellings	1	1	471	471	1884
Attached dwellings - Front-loaded	1.5 – 1.75	2	100	200	300
Attached dwellings - Rear-loaded	1.5 – 1.75	2	105	210	210
TOTAL			676	881	2394

Transportation Facilities (Section 60.55)

The May 22, 2017, Traffic Impact Analysis prepared by Kittelson & Associates focuses on the PUD development and states that 8,558 daily trips will be generated from the proposed development. Transportation improvements have been recommended to mitigate for the trips generated by the development.

Any block that is longer than 600 feet requires pedestrian/bicycle connections through the block approximately every 300 feet. Due to topographical constraints, some blocks are longer than 600 ft. and pedestrian/bicycle connections are provided as described below:

- In the Northwest phase, the block bounded by Street AA, Street CC, Street BB, and Street A is approximately 612 feet long. A pedestrian connection is provided mid-block (Tract NW 8) in alignment with Street E to the south.
- In the West phase, the block bounded by Street A, Street BB, Road 6A, and Street E is approximately 625 feet long. A pedestrian connection is provided mid-block (Tract W1)) to connect Street A with Street E.
- In the Northeast and Central phases, the block to the south of Street V is approximately 1,625 feet long. No bicycle/pedestrian connection is provided through the block because the area to the south is wetland and physical access to the wetland is discouraged.
- In the Northeast and Central phases, the block north of Street V and east of Street Y is approximately 1,100 feet long. A pedestrian connection (Tracts NE6 and C6) is provided in alignment with Street Z to connect Street W and Street V.
- In the East phase, the block south of Street A and west of Strobel Road is approximately 825 ft. long. The area to the south is a stormwater facility and a wetland/stream area. No pedestrian/bicycle access is provided in order to discourage physical access to these areas.

E. Adequate means are provided or can be provided to ensure continued periodic maintenance and necessary normal replacement of the following private common facilities and areas, as applicable: drainage facilities, roads and other improved rights-of-way, structures, recreation facilities, landscaping, fill and excavation areas, screening and fencing, ground cover, garbage and recycling storage areas, and other facilities not subject to maintenance by the City or other public agency.

Response: A Home Owner's Association (HOA) will be created. HOA policies and responsibilities will be established to ensure compliance with this criterion.

F. There are safe and efficient vehicular and pedestrian circulation patterns within the boundaries of the development.

Response: A network of roadways has been developed to safely move people among destinations within the neighborhood and beyond. Each of the local streets within the site has been designed to meet the City's L1 or L2 local street standards, and include sidewalks on both sides of the street. The new multi-use trails provide off-street routes for pedestrian and bicycle travel along the perimeters of the site and within the site, and will connection with future trails off-site.

G. The development's on-site vehicular and pedestrian circulation systems connect to the surrounding circulation systems in a safe, efficient, and direct manner.

Response: The proposed on-site vehicular and pedestrian circulation provides the following connections to the surrounding circulation systems:

- Pedestrian access from the SW Strobel Road sidewalks to the SW Scholls Ferry Road sidewalks
- Pedestrian, bicycle, and vehicle access from Road 8B, Street A, and Street U to SW Strobel Road
- Pedestrian and bicycle access to the north of SW Scholls Ferry Road and to the east of SW Tile Flat Road along the site boundaries. Both of these trails are planned to connect to adjacent trails when those sites develop.
- Pedestrian, bicycle, and vehicle access from Road 6A and Street K to SW Tile Flat Road and the regional trail planned for its eastern side.
- Pedestrian access from the future multi-family site to SW Scholls Ferry Road.

H. Structures and public facilities serving the development site are designed in accordance with adopted City codes and standards and provide adequate fire protection, including, but not limited to, fire flow.

Response: Specific details regarding fire flow and hydrant placement will be reviewed by the Tualatin Valley Fire and Rescue District during site development and building permit stages.

I. Structures and public facilities serving the development site are designed in accordance with adopted City codes and standards and provide adequate protection from crime and accident, as well as protection from hazardous conditions due to inadequate, substandard or ill-designed development.

Response: All streets and public facilities are designed in accordance with the Engineering Design Manual (EDM), or will request EDM exceptions. The subdivision includes street lights, which will provide adequate protection from crime or vehicular accidents. Development permits will be submitted for life and safety review prior to site development.

J. Grading and contouring of the development site is designed to accommodate the proposed use and to mitigate adverse effect(s) on neighboring properties, public right-of-way, surface drainage, water storage facilities, and the public storm drainage system.

Response: Site grading is subject to the standards of Subsection 60.15.10 Grading, and the grading of new streets is required to meet the applicable standards of Chapter II Streets, Chapter VII Bicycle and Pedestrian Facilities, and Chapter VII Standard Drawings of the EDM. Compliance with 60.15.10 is detailed in the responses to that section, below. Compliance with

Section 210 of the EDM will be reviewed with the Site Development Permit for the development. See Sheets P4.1 - P4.6 for preliminary grading plans.

K. Access and facilities for physically handicapped people are incorporated into the development site and building design, with particular attention to providing continuous, uninterrupted access routes.

Response: The street network and facilities are designed in accordance with the City of Beaverton's Engineering Design Manual to provide accessibility as required. Any required on-site pedestrian routes will meet the standards of the American with Disabilities Act (ADA). ADA ramps will be provided within the development to facilitate accessible travel.

L. The application includes all required submittal materials as specified in Section 50.25.1. of the Development Code.

Response: This application includes all required submittal materials specified in this section.

B. 40.15. CONDITIONAL USE

Subsection 40.15.15. Application

4. Planned Unit Development.

A. Threshold. A Planned Unit Development is an application process which:

3. Is required for proposed residential development of a site that is equal to or greater than 10 acres, including all phases, and located within the South Cooper Mountain Community Plan Area

C. Approval Criteria. In order to approve a PUD application, the Planning Commission shall make findings of fact based on evidence provided by the applicant demonstrating that all the following criteria are satisfied:

1. The proposal satisfies the threshold requirements for a PUD application.

Response: The Scholls Heights at South Cooper Mountain PUD occupies 132.15 acres of land and is located within the South Cooper Mountain Community Plan Area. The threshold requirements of 4.A.3 and 4.C.1 have been met.

2. All City application fees related to the application under consideration by the decision making authority have been submitted.

Response: All required fees have been submitted with this application.

3. The proposal meets the Site Development Requirement for setbacks within the applicable zoning district for the perimeter of the parent parcel unless otherwise provided by Section 60.35.[10].03.

Response: The site is currently zoned Washington County AF-20 and does not currently have City of Beaverton zoning. The proposal contains zoning districts R1, R2, R4, R5, and R7. The site is fronted by SW Scholls Ferry Road to the south; the private SW Strobel Road to the east; SW Tile Flat Road to the west, and residential/agricultural properties to the south.

The "front yard" of the site is SW Scholls Ferry Road, and this frontage contains property that will be zoned R1. The R1 front yard minimum setbacks are 10 feet. The R1 setback will be evaluated at the time of future development of the multi-family units.

The “side yards” to the east and west have minimum 5-foot yard setbacks which can be met by the proposed lots in the R2, R4, R5, and R7 zones, which will have side and rear yards adjacent to these property lines.

The “rear yard” of the site is northern property line, and this frontage contains property that will be zoned R2 and R4. The R2 minimum rear yard setback is 15 feet, and the R4 minimum rear yard setback is 15 feet. The zoning district setbacks will be met by the proposed lots adjacent to the northern property line. The area adjacent to the rear property lines of the parent parcel is agricultural and contains a residence.

Because the proposed project is a Planned Unit Development (PUD), individual lots within the site may have reduced setbacks as long as the setbacks are in compliance with Section 60.35.10.3.A-D. Modifications to the front, rear, side, and rear garage setbacks have been requested and are addressed in the responses to that section.

4. The proposal complies with the applicable policies of the Comprehensive Plan.

Response: See Section III of the narrative for demonstration of compliance with the Beaverton Comprehensive Plan and Section IV of the narrative for demonstration of compliance with the South Cooper Mountain Community Plan.

5. The size, dimensions, configuration, and topography of the site and natural and man-made features on the site can reasonably accommodate the proposal.

Response: The topography of the site slopes from northeast to southwest. As acknowledged by the SCM Community Plan, there is significant topography within the area that poses challenges to development. In addition, the project site contains a stream, wetland areas, and associated riparian areas. Man-made features on the site include the transportation network, proposed developable lots, open spaces, and stormwater treatment facilities.

The site has been designed to preserve and enhance the stream, wetland areas, and associated riparian areas and to respond to the topography of the site. These requirements are reasonably accommodated by the proposal.

6. The location, size, and functional characteristics of the proposal are such that it can be made reasonably compatible with and have a minimal impact on livability and appropriate development of properties in the surrounding area of the subject site.

Response: The subject site abuts residential and agricultural sites to the west, north, east, and south. These sites are generally developed with single-family homes and agricultural buildings at a significant distance from the site. A PUD development on the site to the east (The Ridge at South Cooper Mountain) was approved by the Planning Commission on July 3, 2017. There are two out-parcels that will be surrounded by the proposed PUD. The submitted materials include a “shadow plat” of these lots to ensure that they will be able to develop appropriately in the future. This “shadow plat” is intended to be conceptual and does not establish future development plans for the site.

The site has been designed in accordance with the South Cooper Mountain Community Plan, which identifies transportation infrastructure and general development densities and types for the properties immediately adjacent. The project team has coordinated

with the teams preparing development plans for the site to the northeast in order to ensure that key street and trail connections can be made. The proposed development will be reasonably compatible with and will not limit the appropriate development of adjacent properties.

7. *The width of proposed lots or staggering of building setbacks within detached residential developments vary so as to break up the monotony of long blocks and provide for a variety of home shapes and sizes, while giving the perception of open spaces between homes.*

Response: Multiple lot widths are proposed for the subdivision, including a variety of detached single-family homes and attached townhomes. A future development site will support between 216 and 275 multifamily units. Road and pathway connectivity has been maximized to the extent feasible given the topography of the site, and longer blocks are broken up with pedestrian connections.

Three types of homes are proposed: front loaded single-family detached, front loaded town homes, and rear loaded townhomes with driveway parking. There are five distinct single-family detached home designs, and each has two to four variations on façade design for a total of 13 different housing type and façade styles. There are three types of front-loaded townhomes, which will be located in duplex, three-plex, and four-plex configurations. There are also two types of rear/alley-loaded townhomes, which will be located in three-plex and four-plex configurations. In total, there are 18 housing types and façade treatments used within the PUD.

Several distinctive façade designs will be applied to the proposed lots to minimize repetition and provide a variety of home shapes and sizes. See the architectural exhibits for details.

Lot sizes will vary within the zone designations. The R-2 zone includes both attached and detached homes with varying lot widths and home sizes. The R-4 zone includes both attached and detached homes on lots of varying sizes. The R-5 and R-7 zones contain lots of various sizes and homes to be developed with detached homes. The R-7 zone has a deeper minimum setback than the adjacent zones (15 feet compared to 10 feet) so additional visual interest will be provided along those edges.

8. *The lessening of the Site Development Requirements results in significant benefits to the enhancement of site, building, and structural design, preservation of natural features and the surrounding neighborhood as outlined in Section 60.35.15.*

Response: The SCM Community Plan anticipates that flexibility will be needed for development within the South Cooper Mountain area due to topographical challenges and the prevalence of natural resource areas. Reductions in minimum setbacks have been requested in order to provide flexibility in the siting of homes on each lot. The reductions allow for significant benefits, such as additional variety in housing types and provision for “clustering” of the lots to provide a significant buffer between the proposed development and the natural feature through the center of the site. The clustering of lots also provides the opportunity for the construction of a community trail along the natural feature and a connected system of walking trails. These benefits are further addressed in the responses to Section 60.35.15.

9. *The proposal provides improved open space that is accessible and usable by persons living nearby. Open space meets the following criteria unless otherwise determined by the Planning Commission through Section 60.35.15.:*
 - a. *The dedicated land forms a single parcel of land except where the planning commission determines two (2) parcels or more would be in the public interest and complement the overall site design.*
 - b. *The shape of the open space is such that the length is not more than three (3) times the width the purpose of which is to provide usable space for a variety of activities except where the Planning Commission determines a greater proportioned length would be in the public interest and complement the overall site design.*
 - c. *The dedicated land(s) is located to reasonably serve all lots for the development, for which the dedication is required.*

Response: The subject site is located within the South Cooper Mountain Community Plan area, and is subject to the criteria of Section 60.35.15.2. The open space requirements of Section 60.35.15 are addressed in the responses to that section.

10. *[ORD 4578; March 2012] For proposals within the SC-S (Station Community-Sunset) zoning district, the requirements identified in Sections 20.20.40.2. and 20.20.40.3. are satisfied.*

Response: The subject site is not located within the SC-S zoning district. This criterion is not applicable.

11. *If the application proposes to develop the PUD over multiple phases, the decision making authority may approve a time schedule of not more than five (5) years for the multiple development phases. If a phased PUD has been approved, development applications for the future phases of the PUD shall be filed within five (5) years unless the PUD has received an extension approval pursuant to Section 50.93. of the Development Code.*

Response: The application proposes to develop the PUD over seven phases. The applicant understands that if the phased PUD is approved, development applications shall be filed within 5 years. An extension request will be submitted if needed.

12. *Applications and documents related to the request, which will require further City approval, shall be submitted to the City in the proper sequence.*

Response: This application includes this Conditional Use – Planned Unit Development application with associated Preliminary Subdivision, Design Review 2, Tree Plan 2, Comprehensive Plan Map Amendment, and Quasi-Judicial Zoning Map Amendment applications for this project. No additional required applications have been identified at this time.

C. 40.20. DESIGN REVIEW

40.20.15. Application.

2. Design Review Two.

- A. *Threshold. An application for Design Review Two shall be required when an application is subject to applicable design standards and one or more of the following thresholds describe the proposal:*
3. *New construction of attached residential dwellings excluding duplexes, in any zone where attached dwellings are a Permitted or Conditional Use.*

Response: The proposed development includes the new construction of attached residential dwellings in zones where attached dwellings are a Permitted Use, and Design Review Two is required.

B. Procedure Type. The Type 2 procedure, as described in Section 50.40. of this Code, shall apply to an application for Design Review Two. The decision making authority is the Director.

Response: The application is subject to review through the Type 2 procedure. However, the application is being submitted concurrently with a Type 3 application and is subject to the higher level of review.

C. Approval Criteria. [ORD 4365; October 2005] In order to approve a Design Review Two application, the decision making authority shall make findings of fact based on evidence provided by the applicant demonstrating that all the following criteria are satisfied:

1. The proposal satisfies the threshold requirements for a Design Review Two application.

Response: The proposal is a Planned Unit Development that includes 205 attached single-family homes (townhomes), which meets threshold A.3, new construction of attached residential dwellings. This criterion is met.

2. All City application fees related to the application under consideration by the decision making authority have been submitted.

Response: All required fees have been submitted with this application.

3. The proposal contains all applicable application submittal requirements as specified in Section 50.25.1 of the Development Code.

Response: The application contains all applicable application submittal requirements. This criterion is met.

4. The proposal is consistent with all applicable provisions of Sections 60.05.15 through 60.05.30. (Design Standards).

Response: Compliance with the Design Review Standards is addressed in the response to Sections 60.05.15 through 60.05.30. This criterion is met.

5. For additions to or modifications of existing development, the proposal is consistent with all applicable provisions of Sections 60.05.15 through 60.05.30 (Design Standards) or can demonstrate that the proposed additions or modifications are moving towards compliance with specific Design Standards if any of the following conditions exist:

a. A physical obstacle such as topography or natural feature exists and prevents the full implementation of the applicable standard; or

b. The location of existing structural improvements prevent the full implementation of the applicable standard; or

c. The location of the existing structure to be modified is more than 300 feet from a public street.

Response: The proposal is for a new development on a largely vacant site. This criterion is not applicable.

6. *Applications and documents related to the request, which will require further City approval, shall be submitted to the City in the proper sequence.*

Response: This application includes this Conditional Use – Planned Unit Development application with associated Preliminary Subdivisions, Design Review 2, Tree Plan 2, Quasi-Judicial Zoning Map Amendment, and Comprehensive Plan Map Amendment applications for this project. No additional required applications have been identified at this time.

D. 40.45. LAND DIVISION AND RECONFIGURATION

Response: This application includes two preliminary subdivision requests: a large lot subdivision and a Planned Unit Development subdivision. Each is addressed separately below.

Large Lot Subdivision

5. Preliminary Subdivision.

A. Threshold. An application for Preliminary Subdivision shall be required when the following threshold applies:

1. *The creation of four (4) or more new lots from at least one (1) lot of record in one (1) calendar year.*

Response: The proposed subdivision will create 13 lots. This threshold has been met.

C. Approval Criteria. In order to approve a Preliminary Subdivision application, the decision making authority shall make findings of fact based on evidence provided by the applicant demonstrating that all the following criteria are satisfied:

1. *The application satisfies the threshold requirements for a Preliminary Subdivision application. If the parent parcel is subject to a pending Legal Lot Determination under Section 40.47., further division of the parent parcel shall not proceed until all of the provisions of Section 40.47.15.1.C. have been met.*

Response: The proposed subdivision will create 13 lots and meets the threshold for a Preliminary Subdivision application. The parent parcels are not subject to a pending Legal Lot Determination. This criterion is met.

2. *All City application fees related to the application under consideration by the decision making authority have been submitted.*

Response: All required fees have been submitted with this application.

3. *The proposed development does not conflict with any existing City approval, except the City may modify prior approvals through the subdivision process to comply with current Code standards and requirements.*

Response: City staff has not identified any existing City approvals for this site. This criterion is met.

4. *Oversized lots resulting from the subdivision shall have a size and shape which will facilitate the future potential partitioning or subdividing of such oversized lots in accordance with the requirements of the Development Code. In addition, streets, driveways, and utilities shall be sufficient to serve the proposed subdivision and future potential development on oversized lots. Easements and rights-of-*

way shall either exist or be proposed to be created such that future partitioning or subdividing is not precluded or hindered, for either the oversized lot or any affected adjacent lot.

Response: The 13-lot preliminary subdivision will include oversized lots. As shown in Sheet P6.0, the lots follow the proposed phasing lines as well as the proposed zoning boundaries. These lots are intended for further subdivision as each phase is developed, per Sheet P0.5. The shape and size of the lots facilitate the future subdivision of the lots as proposed by the PUD application submitted concurrent with this application.

Streets, driveways, and utilities for each of the large lots are proposed as shown in Sheet P6.0. Each lot will be served by public right-of-way, as shown in the hatched areas, and public utilities will be extended within the right-of-way. Sanitary sewer and water will be connected to The Ridge PUD to the east, and Lot 11 will connect to sanitary sewer in Scholls Ferry Road. Driveways from the public right-of-way will be provided at the time of development. It is anticipated that the parcels will be further divided as each phase is developed, and individual lots will be provided with driveways at that time.

This criterion is met.

5. *If phasing is requested by the applicant, the requested phasing plan meets all applicable City standards and provides for necessary public improvements for each phase as the project develops.*

Response: The 13-lot subdivision will divide the property by phase and by zoning designation. The phasing plan and associated public improvements for each phase are shown in Sheets P0.5ALL through P0.5S. This criterion is met.

6. *Applications that apply the lot area averaging standards of Section 20.05.15.D. shall demonstrate that the resulting land division facilitates the following:*
- a) *Preserves a designated Historic Resource or Significant Natural Resource (Tree, Grove, Riparian Area, Wetland, or similar resource); or,*
 - b) *Complies with minimum density requirements of the Development Code, provides appropriate lot size transitions adjacent to differently zoned properties, minimizes grading impacts on adjacent properties, and where a street is proposed provides a standard street cross section with sidewalks.*

Response: The proposed land division does not apply the lot area averaging standards. This criterion is not applicable.

7. *Applications that apply the lot area averaging standards of Section 20.05.50.1.B do not require further Adjustments or Variance for the Land Division.*

Response: The proposed land division does not apply the lot area averaging standards. This criterion is not applicable.

8. *The proposal does not create a parcel which will have more than one (1) zoning designation.*

Response: No lots with more than one (1) zoning designation are proposed. This criterion is met.

9. *Applications and documents related to the request requiring further City approval shall be submitted to the City in the proper sequence.*

Response: All required applications and documents have been submitted. Additional applications and documents will be submitted as required. This criterion is met.

Planned Development Subdivision

5. Preliminary Subdivision.

A. Threshold. An application for Preliminary Subdivision shall be required when the following threshold applies:

- 1. The creation of four (4) or more new lots from at least one (1) lot of record in one (1) calendar year.***

Response: The proposed subdivision will create 677 lots. This threshold has been met.

C. Approval Criteria. In order to approve a Preliminary Subdivision application, the decision making authority shall make findings of fact based on evidence provided by the applicant demonstrating that all the following criteria are satisfied:

- 1. The application satisfies the threshold requirements for a Preliminary Subdivision application. If the parent parcel is subject to a pending Legal Lot Determination under Section 40.47., further division of the parent parcel shall not proceed until all of the provisions of Section 40.47.15.1.C. have been met.***

Response: The proposed subdivision will create 677 lots and meets the threshold requirements for a Preliminary Subdivision application. The parent parcels are not subject to a pending Legal Lot Determination. This criterion is met.

- 2. All City application fees related to the application under consideration by the decision making authority have been submitted.***

Response: All required fees have been submitted with this application.

- 3. The proposed development does not conflict with any existing City approval, except the City may modify prior approvals through the subdivision process to comply with current Code standards and requirements.***

Response: City staff has not identified any existing City approvals for this site. This criterion is met.

- 4. Oversized lots resulting from the subdivision shall have a size and shape which will facilitate the future potential partitioning or subdividing of such oversized lots in accordance with the requirements of the Development Code. In addition, streets, driveways, and utilities shall be sufficient to serve the proposed subdivision and future potential development on oversized lots. Easements and rights-of-way shall either exist or be proposed to be created such that future partitioning or subdividing is not precluded or hindered, for either the oversized lot or any affected adjacent lot.***

Response: Oversized lots (more than 195% of minimum lot area) are proposed but are not intended for future subdivision. One parcel is proposed for future development of between 216 and 275 attached dwellings. This criterion is met.

- 5. If phasing is requested by the applicant, the requested phasing plan meets all applicable City standards and provides for necessary public improvements for each phase as the project develops.***

Response: The proposed PUD is proposed to be developed in seven phases. The phasing plan and associated public improvements for each phase are shown in Sheets

P0.5ALL through P0.5S. The appropriate development applications will be submitted within 5 years of PUD approval or an extension will be filed within that time frame. This criterion is met.

6. *Applications that apply the lot area averaging standards of Section 20.05.15.D. shall demonstrate that the resulting land division facilitates the following:*
- a) Preserves a designated Historic Resource or Significant Natural Resource (Tree, Grove, Riparian Area, Wetland, or similar resource); or,*
 - b) Complies with minimum density requirements of the Development Code, provides appropriate lot size transitions adjacent to differently zoned properties, minimizes grading impacts on adjacent properties, and where a street is proposed provides a standard street cross section with sidewalks.*

Response: The proposed PUD requests a reduction to minimum lot sizes through the PUD process rather than the lot averaging standards of Section 20.05.15.D. This criterion is not applicable.

7. *Applications that apply the lot area averaging standards of Section 20.05.50.1.B do not require further Adjustments or Variance for the Land Division.*

Response: The proposed PUD requests a reduction to minimum lot sizes through the PUD process rather than the lot averaging standards of Section 20.05.15.D. This criterion is not applicable.

8. *The proposal does not create a parcel which will have more than one (1) zoning designation.*

Response: No lots with more than one (1) zoning designation are proposed. This criterion is met.

9. *Applications and documents related to the request requiring further City approval shall be submitted to the City in the proper sequence.*

Response: All required applications and documents have been submitted. Additional applications and documents will be submitted as required. This criterion is met.

E. 40.58 SIDEWALK DESIGN MODIFICATION

40.58.15. Application.

There is a single Sidewalk Design Modification application which is subject to the following requirements.

- A. *Threshold. An application for Sidewalk Design Modification shall be required when one of the following thresholds applies:*

- 1. The sidewalk width, planter strip width, or both minimum standards specified in the Engineering Design Manual are proposed to be modified.*
- 2. The dimensions or locations of street tree wells specified in the Engineering Design Manual are proposed to be modified.*

Response: The planter strip width is proposed to be modified for Tract E26 to allow construction of curb-tight sidewalks within the available street width. The application meets the threshold of A.1 above.

- B. *Procedure Type. The Type 1 procedure, as described in Section 50.35. of this Code, shall apply to an application for Sidewalk Design Modification. The decision making authority is the Director.*

- C. *Approval Criteria. In order to approve a Sidewalk Design Modification application, the decision making authority shall make findings of fact based on evidence provided by the applicant demonstrating that the following criteria are satisfied:*
1. *The proposal satisfies the threshold requirements for a Sidewalk Design Modification application.*
 2. *All City application fees related to the application under consideration by the decision making authority have been submitted.*

Response: The proposal is subject to review through a Type 1 procedure but is being submitted concurrently with Type 2 and 3 applications.

The proposal satisfies the threshold requirements of 40.58.15.A.1, and the application fees have been submitted with the application.

3. *One or more of the following criteria are satisfied:*
 - a. *That there exist local topographic conditions, which would result in any of the following:*
 - i. *A sidewalk that is located above or below the top surface of a finished curb.*
 - ii. *A situation in which construction of the Engineering Design Manual standard street cross-section would require a steep slope or retaining wall that would prevent vehicular access to the adjoining property.*

Response: Tract E26 is a private street tract to provide access to Lots 185-190. These lots are garage-under lots tucked into a steep terraced hillside. Tract E26 has approximately 322.6 lineal feet of frontage along lots 185-191, and approximately 249.3 lineal feet of frontage along Tract E25, a pocket park.

Within the tract, on the north side, a curb tight sidewalk is proposed to be constructed adjacent to a mountable curb that provides driveway access to the homes fronting on the tract. At each driveway location, the sidewalk will be constructed with similar thickness and steel reinforcement as shown in the City's commercial driveway standard detail. Curb-tight sidewalk on the south side of the tract will be constructed adjacent to a full height standard curb and gutter, with no driveway accesses. This sidewalk abuts public open space to the south that will be fully planted and landscaped.

If the street were widened to allow for the installation of both planter strips and sidewalks on both sides, significant retaining walls would be necessary on the downhill (park side) of the street as well as between homes, introducing difficulty in accessing the driveways of the affected homes and reducing ease of access by maintenance vehicles and park users.

- b. *That there exist local physical conditions such as:*
 - i. *An existing structure prevents the construction of a standard sidewalk.*
 - ii. *An existing utility device prevents the construction of a standard sidewalk.*
 - iii. *Rock outcroppings prevent the construction of a standard sidewalk without blasting.*
- c. *That there exist environmental conditions such as a Significant Natural Resource Area, Jurisdictional Wetland, Clean Water Services Water Quality Sensitive Area, Clean Water Services required Vegetative Corridor, or Significant Tree Grove.*
- d. *That additional right of way is required to construct the Engineering Design Manual standard and the adjoining property is not controlled by the applicant.*

Response: None of these physical conditions exist. These criteria are not applicable.

4. *The proposal complies with provisions of Section 60.55.25. (Street and Bicycle and Pedestrian Connection Requirements) and 60.55.30 (Minimum Street Widths).*

Response: The provisions of Sections 60.55.25 and 60.55.30 are addressed in Section VII.G below. The proposal complies with those provisions.

5. *Applications and documents related to the request, which will require further City approval, have been submitted to the City in the proper sequence.*

Response: The required applications and documents have been submitted to the City.

6. *The proposed Sidewalk Design Modification provides safe and efficient pedestrian circulation in the site vicinity.*

Response: The proposed modification allows the construction of sidewalks on both sides of the street within the constrained width of the street. This modification provides safe and efficient pedestrian circulation between the homes and pocket park fronting the tract and Street U to the southwest.

F. 40.90. TREE PLAN

40.90.10. Applicability.

Different types of resources require different levels of protection. No Tree Plan is required for the following actions:

12. *Removal of any tree associated with a public street and sidewalk improvement project that meets A. or B. and C: [ORD 4659; June 2015]*
 - A. *Improvements within an existing public vehicular right-of-way; or*
 - B. *Improvements to a public vehicular right-of-way in order to meet functional classification standards, such as widening or half-street improvements; and*
 - C. *The proposed improvements do not exceed the minimum width standards of the Engineering Design Manual.*

Response: The removal of trees for widening and construction of SW Strobel Road and SW Tile Flat Road are required in order to meet functional classification standards as determined by the City of Beaverton and Washington County Transportation System Plan and the Development Code, and do not exceed the minimum width standards of the Engineering Design Manual. As such, the removal of trees required to construct the improvements to these rights-of-way are exempt from Tree Plan review.

40.90.15. Application

2. *Tree Plan Two.*
 - A. *Threshold. An application for Tree Plan Two shall be required when none of the actions listed in Section 40.90.10. apply, none of the thresholds listed in Section 40.90.15.1. apply, and one or more of the following thresholds apply:*
 1. *Removal of five (5) or more Community Trees, or more than 10% of the number of Community Trees on the site, whichever is greater, within a one (1) calendar year period, except as allowed in Section 40.90.10.1.*
 3. *Commercial, Residential, or Industrial zoning district: Removal of up to and including 75% of the total DBH of non-exempt surveyed tree(s) found on the project site within SNRAs, Significant Groves, or Sensitive Areas as defined by Clean Water Services.*
 - C. *Approval Criteria. In order to approve a Tree Plan Two application, the decision making authority shall make findings of fact based on evidence provided by the applicant demonstrating that all the following criteria are satisfied:*
 1. *The proposal satisfies the threshold requirements for a Tree Plan Two application.*

Response: The site contains Community Trees as well as trees located within mapped SNRA areas. Removal of 175 Community Trees and 61% of the total DBH of non-

exempt trees is proposed outside of the SNRA on the site. Removal of 15 trees and 19.9% of the total DBH of non-exempt trees is proposed within the SNRA on site. This proposal satisfies thresholds 1 and 3 for a Tree Plan Two application.

2. *All City application fees related to the application under consideration by the decision making authority have been submitted.*

Response: All required fees have been submitted with this application.

3. *If applicable, removal of any tree is necessary to observe good forestry practices according to recognized American National Standards Institute (ANSI) A300-1995 standards and International Society of Arborists (ISA) standards on the subject.*

Response: The proposed tree removal is necessary to accommodate the development of the site and associated grading and construction. This criterion is not applicable.

4. *If applicable, removal of any tree is necessary to accommodate physical development where no reasonable alternative exists.*

Response: The proposed site design clusters the development in order to maintain and enhance the existing significant natural resource areas through the center of the site. As a result, tree removal is necessary elsewhere on the site to accommodate the development of residential lots, streets, and open spaces to serve the development.

The trees proposed for removal are clustered near the existing residential dwellings in the central portion of the site. The majority of these trees will be removed as part of the grading required to create development lots and the street network required by block perimeter and connectivity standards. The alternative to tree removal would be the reduction of lots and dwelling units on site as well as removal of some of the street connectivity on the site. These are not reasonable alternatives because the lots are needed to meet the minimum density requirements of the South Cooper Mountain Community Plan and the streets are needed to provide frontage to the lots and meet the City's connectivity and block perimeter standards. This criterion is met.

5. *If applicable, removal of any tree is necessary because it has become a nuisance by virtue of damage to property or improvements, either public or private, on the subject site or adjacent sites.*

Response: The proposed tree removal is intended to allow development of the site, and is not a response to nuisance. This criterion is not applicable.

6. *If applicable, removal is necessary to accomplish public purposes, such as installation of public utilities, street widening and similar needs, where no reasonable alternative exists without significantly increasing public costs or reducing safety.*

Response: The proposed installation and widening of public streets requires the removal of 116 Community Trees, as shown on Sheets LTP-1 through LTP-7. The proposed installation of public streets and utilities requires the removal of 13 trees within the SNRA.

7. *If applicable, removal of any tree is necessary to enhance the health of the tree, grove, SNRA, or adjacent trees, or to eliminate conflicts with structures or vehicles.*

Response: The proposed tree removal is necessary for development of the site, which includes residential lots, streets, open spaces, stormwater facilities, and trails. Thirteen trees are proposed for removal from the on-site SNRA for the purposes of constructing the new collector roads, neighborhood route, and widening of SW Strobel Road and construction of SW Tile Flat Road improvements; construction of a stormwater facility; construction of multi-use trails. Enhancement of tree or grove health is not a factor, however, removal will facilitate development, including streets, lots, water quality facilities, and trails.

8. *If applicable, removal of a tree(s) within a SNRA or Significant Grove will not result in a reversal of the original determination that the SNRA or Significant Grove is significant based on criteria used in making the original significance determination.*

Response: Tree removal is limited to areas intended for development, avoiding SNRA locations where practicable. These tree removals will not result in a reversal of the original determination qualifying the area as an SNRA.

9. *If applicable, removal of a tree(s) within a SNRA or Significant Grove will not result in the remaining trees posing a safety hazard due to the effects of windthrow.*

Response: The limited proposed removal of trees within the SNRA on site will not result in isolated trees or hazards due to windthrow.

10. *The proposal is consistent with all applicable provisions of Section 60.60. (Trees and Vegetation) and Section 60.67. (Significant Natural Resources).*

Response: The proposal is consistent with the applicable provisions of 60.60 and 60.67 as described in the responses to those sections.

11. *Grading and contouring of the site is designed to accommodate the proposed use and to mitigate adverse effects on neighboring properties, public right-of-way, surface drainage, water storage facilities, and the public storm drainage system.*

Response: Site grading is subject to the standards of Subsection 60.15.10 Grading, and the grading of new streets is required to meet the applicable standards of Section 210 of the EDM. Compliance with 60.15.10 is detailed in the responses to that section, below. Compliance with Section 210 of the EDM will be reviewed with the Site Development Permit for the development. See Sheets P4.1 through P4.6 for details.

12. *The proposal contains all applicable application submittal requirements as specified in Section 50.25.1. of the Development Code.*

Response: The application contains all applicable application submittal requirements. This criterion is met.

13. *Applications and documents related to the request, which will require further City approval, shall be submitted to the City in the proper sequence.*

Response: This application includes this Conditional Use – Planned Unit Development application with associated Preliminary Subdivision, Design Review 2, Tree Plan 2, Comprehensive Plan Map Amendment, and Quasi-Judicial Zoning Map Amendment applications for this project. No additional required applications have been identified at this time.

G. 40.97. ZONING MAP AMENDMENT

40.97.15. Application.

There are four (4) Zoning Map Amendment applications which are as follows: Quasi-Judicial Zoning Map Amendment, Legislative Zoning Map Amendment, Non-Discretionary Annexation Related Zoning Map Amendment and Discretionary Annexation Related Zoning Map Amendment.

1. *Quasi-Judicial Zoning Map Amendment.*

A. Threshold. An application for Quasi-Judicial Zoning Map Amendment shall be required when the following threshold applies:

1. The change of zoning designation for a specific property or limited number of specific properties.

C. Approval Criteria. In order to approve a Quasi-Judicial Zoning Map Amendment application, the decision making authority shall make findings of fact based on evidence provided by the applicant demonstrating that all the following criteria are satisfied:

1. The proposal satisfies the threshold requirements for a Quasi-Judicial Zoning Map Amendment application.

Response: The proposal is for a Zoning Map Amendment to implement City zoning on the subject sites consistent with the South Cooper Mountain Community Plan and the existing Land Use designations applied with the adoption of the Plan. The proposed zoning designation is in conjunction with a request for approval of a 677-lot unit subdivision and PUD. The proposal would rezone the four properties from Washington County AF-20 zoning to City of Beaverton R1, R2, R4, R5, and R7 zoning designations. The proposal meets Threshold 1 for a Quasi-Judicial Zoning Map Amendment. This criterion is met.

2. All City application fees related to the application under consideration by the decision making authority have been submitted.

Response: All required fees have been submitted with this application.

3. The proposal conforms with applicable policies of the City's Comprehensive Plan.

Response: Staff identified the following Comprehensive Plan criteria as applicable to the proposed Zoning Amendment (see Appendix A):

- Goal 3.13.1, Policies c-e
- Goal 3.13.3, Policy a
- Goal 3.13.4, Policies a and b
- Goal 3.13.5, Policy a
- Goal 4.2.2.1, Policy a
- Goals 5.4.1 – 5.10.1
- Goal 6.2.1, Policies a, d, and e
- Goal 6.2.2, Policies c-j
- Goal 6.2.3, Policies b, d, and e-h
- Goal 6.2.5, Policy a
- Goal 7.1.1, Policies b and c
- Goal 7.3.1, Policies a-h
- Goal 7.3.3, Policies a-c
- South Cooper Mountain Community Plan Land Use Implementation Policies (Land Use Implementation, Street Policies, Bicycle and Pedestrian Framework Policies, and Natural Resource Policies)

Conformance with the applicable policies of the Comprehensive Plan is addressed in Section III, and conformance with the applicable South Cooper Mountain Community Plan policies is addressed in Section IV of this narrative.

4. *All critical facilities and services are available or can be made available to an adequate capacity to serve the site and uses allowed by the proposed zoning designation.*

Response: The availability of critical facilities and services is addressed in the response to Section 40.03.A.

5. *Essential facilities and services are available or can be made available to serve the site and uses allowed by the proposed zoning designation.*

Response: The availability of essential facilities and services is addressed in the response to Section 40.03.A.

6. *The proposal is or can be made to be consistent with all applicable provisions of Chapter 20 (Land Uses).*

Response: Consistency with the applicable provisions of Chapter 20 is addressed earlier in this narrative. The proposal is consistent with all applicable provisions as adjusted through the Planned Development application process.

7. *The proposal shall include a Traffic Impact Analysis that meets the requirements of 60.55.20. The analysis shall demonstrate that development allowed under the proposed zoning can meet the requirements of 60.55.10.1, 60.55.10.2, 60.55.10.3, and 60.55.10.7. The analysis shall identify the traffic impacts from the range of uses allowed under the proposed zoning and demonstrate that these impacts can be reasonably mitigated at the time of development.*

Response: A Traffic Impact Analysis has been prepared by Kittelson and Associates, Inc., and is included as Impact Study E. The requirements of 60.55.10.1-3 and 7 are addressed in the responses to that section.

8. *As an alternative to 40.97.15.1.C.8, the applicant may provide evidence that the potential traffic impacts from development under the proposed zoning are no greater than potential impacts from development under existing zoning.*

Response: Applicant is not seeking the alternative approval.

9. *The proposal contains all applicable application submittal requirements as specified in Section 50.25.1. of the Development Code.*

Response: The application contains all applicable application submittal requirements. This criterion is met.

10. *Applications and documents related to the request, which will require further City approval, shall be submitted to the City in the proper sequence.*

Response: This application includes this Conditional Use – Planned Unit Development application with associated Preliminary Subdivision, Design Review 2, Tree Plan 2, Quasi-Judicial Zoning Map Amendment, and Comprehensive Plan Map Amendment applications for this project. No additional required applications have been identified at this time.

VII. COMPLIANCE WITH CHAPTER 60 SPECIAL REQUIREMENTS

A. 60.05. DESIGN REVIEW DESIGN PRINCIPLES, STANDARDS AND GUIDELINES

60.05.15. *Building Design and Orientation Standards.*

Unless otherwise noted, all standards apply in all zoning districts.

1. *Building articulation and variety.*

A. Attached residential buildings in Residential zones shall be limited in length to two hundred (200) feet.

Response: The proposed development includes duplex, three- and four-plex buildings. The units range from 15 to 18 feet in width and none of these attached residential buildings exceed 200 feet in length.

B. Buildings visible from and within 200 feet of an adjacent public street shall have a minimum portion of the street-facing elevation(s) and the elevation(s) containing a primary building entrance or multiple tenant entrances devoted to permanent architectural features designed to provide articulation and variety. These permanent features include, but are not limited to windows, bays and offsetting walls that extend at least eighteen inches (18”), recessed entrances, loading doors and bays, and changes in material types. Changes in material types shall have a minimum dimension of two feet and minimum area of 25 square feet. The percentage of the total square footage of elevation area is:

1. Thirty (30) percent in Residential zones and all uses in Commercial and Multiple Use zones.

Response: Each of the lots in the proposed subdivision is sized and located to accommodate buildings that meet these standards. All of the attached buildings will be visible from and within 200 feet of adjacent public streets and will be subject to these standards. Example building elevations are included as Architectural Sheets. Each of the elevations contain a primary building entrance that faces the street, as well as permanent architectural features including recesses and extensions, and changes in material types on street-facing elevations.

C. The maximum spacing between permanent architectural features shall be no more than:

1. Forty (40) feet in Residential zones, and all uses in Commercial and Multiple Use zones.

Response: None of the proposed attached buildings exceed 40 feet in width (attached lot widths vary from 15 feet to 20 feet). Example attached building plans and elevations are included as Architectural Sheets. Each of the elevations is well-articulated and the various plans include a variety of permanent architectural features.

D. In addition to the requirements of Section 60.05.15.1.B. and C, detached and attached residential building elevations facing a street, common green or shared court shall not consist of undifferentiated blank walls greater than 150 square feet in area. Building elevations shall be articulated with architectural features such as windows, dormers, porch details, alcoves, balconies or bays.

Response: All of the detached and attached residential buildings will face a street and are subject to these standards. Buildings located on street corners include articulation and design features along the “side” wall, and none of the proposed buildings contain blank walls. Example attached and detached building plans and elevations are included as Architectural Sheets.

2. *Roof forms.*

A. All sloped roofs exposed to view from adjacent public or private streets and properties shall have a minimum 4/12 pitch.

- B. *Sloped roofs on residential uses in residential zones and on all uses in multiple use and commercial zones shall have eaves, exclusive of rain gutters, that must project from the building wall at least twelve (12) inches.*
- C. *All roofs with a slope of less than 4/12 pitch shall be articulated with a parapet wall that must project vertically above the roof line at least twelve (12) inches or architecturally treated, such as with a decorative cornice.*

Response: All of the proposed buildings have a minimum roof pitch of 4/12. Generally, roof pitches vary from 5/12 to 8/12, as illustrated in the Architectural Sheets.

3. *Primary building entrances.*

- A. *Primary entrances, which are the main point(s) of entry where the majority of building users will enter and leave, shall be covered, recessed, or treated with a permanent architectural feature in such a way that weather protection is provided. The covered area providing weather protection shall be at least six (6) feet wide and four (4) feet deep.*

Response: Each of the proposed buildings includes a dedicated entrance and a porch at the first or second level. Each of the porches is at least 6 feet wide and 4 feet deep, as illustrated in the Architectural Sheets.

4. *Exterior building materials.*

- A. *For attached residential uses in Residential zones and all residential uses in Multiple Use zones, a minimum of seventy-five (75) percent of each elevation that is visible from and within 200 feet of a public street or a public park, public plaza or other public open space, and on elevations that include a primary building entrance or multiple tenant entrances shall be double wall construction.*

Response: All proposed buildings are specified to be comprised of double-wall construction, as illustrated in the Architectural Sheets.

5. *Roof-mounted equipment.*

- A. *All roof-mounted equipment shall be screened from view from adjacent streets or adjacent properties in one of the following ways:[...]*

Response: No roof-mounted equipment is proposed.

6. *Building location and orientation along streets in Commercial and Multiple Use zones.*

Response: No commercial or multiple use zones exist within the proposal. These criteria are not applicable.

7. *Building scale along Major Pedestrian Routes.*

Response: City staff indicates that the subject site does not abut a Major Pedestrian Route. This criterion is not applicable.

8. *Ground floor elevations on commercial and multiple use buildings.*

Response: The subject site does not include commercial or multiple use buildings. This criterion is not applicable.

9. *Compact Detached Housing design.*

Response: No Compact Detached Housing is proposed. This criterion is not applicable.

60.05.20. Circulation and Parking Design Standards.

Unless otherwise noted, all standards apply in all zoning districts.

1. Connections to the public street system.

- A. Pedestrian, bicycle, and motor vehicle connections shall be provided between the on-site circulation system and adjacent existing and planned streets as specified in Tables 6.1 through 6.6 and Figures 6.1 through 6.23 of the Comprehensive Plan Transportation Element.*

Response: The Comprehensive Plan Transportation Element has not yet incorporated the South Cooper Mountain plan area. The attached single-family portion of the site connects to the existing street system through a network of public streets in accordance with the South Cooper Mountain Community Plan. A new north-south collector will provide eventual connection to the North Cooper Mountain Area from SW Scholls Ferry Road to the east. A new east-west collector will provide a parallel route to SW Scholls Ferry Road that will eventually connect to SW 175th Ave. A new north-south neighborhood route provides connection between the southeast corner of the site and northwest corner of the site, and creates a larger gridded circulation pattern for the site. An upgraded and widened SW Strobel Road connects to SW Scholls Ferry Road and will provide a future connection to properties to the north. An east-west multi-use trail north of SW Scholls Ferry Road connects to a proposed north-south multi-use trail along the stream and wetland on site and a proposed multi-use trail east of SW Tile Flat Road. Each of the expanded and new streets includes sidewalks.

2. Loading areas, solid waste facilities and similar improvements.

- A. All on-site service areas, outdoor storage areas, waste storage, disposal facilities, recycling containers, transformer and utility vaults and similar activities shall be located in an area not visible from a public street, or shall be fully screened from view from a public street.*
- B. Except for manufacturing, assembly, fabricating, processing, packing, storage and wholesale and distribution activities which are the principle use of a building in Industrial districts, all loading docks and loading zones shall be located in an area not visible from a public street, or shall be fully screened from view from a public street.*
- C. Screening from public view for service areas, loading docks, loading zones and outdoor storage areas, waste storage, disposal facilities, recycling containers, transformer and utility vaults and similar activities shall be fully sight-obscuring, shall be constructed a minimum of one foot higher than the feature to be screened, and shall be accomplished by one or more of the following methods:[...]*

Response: The attached single-family dwellings will have individual solid waste and recycling service and curb-side collection will be provided by the franchise waste hauler. Individual garages provide adequate space to store the containers.

The future multifamily development will require solid waste and recycling facilities. Those facilities will be reviewed as part of a future application.

3. Pedestrian circulation.

- A. Pedestrian connections shall be provided that link to adjacent existing and planned pedestrian facilities as specified in Tables 6.1 through 6.6 and Figures 6.1 through 6.23 of the Comprehensive Plan Transportation Element, and to the abutting public street system and on-site buildings, parking areas, and other facilities where pedestrian access is desired. Pedestrian connections shall be provided except when one or more of the following conditions exist:*
- 1. Where physical or topographic conditions, such as a grade change of ten (10) feet or more at a property line to an adjacent pedestrian facility, make connections impractical,*
 - 2. Where uses including manufacturing, assembly, fabricating, processing, packing, storage and wholesale and distribution activities which are the principle use of a building in Industrial districts occur,*

3. *Where on-site activities such as movement of trucks, forklifts, and other large equipment would present potential conflicts with pedestrians, or*
4. *Where buildings or other existing development on adjacent lands physically preclude a connection now or in the future.*

Response: The Comprehensive Plan Transportation Element has not yet incorporated the South Cooper Mountain plan area. The attached single-family portion of the site connects to the existing street system through a network of pedestrian connections in accordance with the South Cooper Mountain Community Plan. The widened SW Strobel Road includes a multi-use trail along the north side. SW Tile Flat Road includes a multi-use/regional trail along its eastern side, north of its intersection with SW Scholls Ferry Road. A north-south community trail connects the SW Scholls Ferry trail in the south with the property boundary to the north, and connects various active and passive open spaces along the way. In addition, all of the dwellings are connected to the pedestrian/sidewalk system by the driveway and a pedestrian path to the front door. See Sheets P3.9 through P3.12.

- B. *A reasonably direct walkway connection is required between primary entrances, which are the main point(s) of entry where the majority of building users will enter and leave, and public and private streets, transit stops, and other pedestrian destinations.*

Response: Primary entrances for the attached single-family dwellings will be connected to public streets by a direct walkway from each entrance. See Sheets P3.9 through P3.12.

- C. *A reasonably direct pedestrian walkway into a site shall be provided for every 300 feet of street frontage or for every eight aisles of vehicle parking if parking is located between the building and the street. A reasonably direct walkway shall also be provided to any accessway abutting the site. This standard may be waived when topographic conditions, man-made features, natural areas, etc. preclude walkway extensions to adjacent properties.*

Response: No parking is proposed between the building and the street.

Any block that is longer than 600 feet requires pedestrian/bicycle connections through the block approximately every 300 feet. Due to topographical constraints, some blocks are longer than 600 ft. and pedestrian/bicycle connections are provided as described below:

- In the Northwest phase, the block bounded by Street AA, Street CC, Street BB, and Street A is approximately 612 feet long. A pedestrian connection is provided mid-block (Tract NW 8) in alignment with Street E to the south.
- In the West phase, the block bounded by Street A, Street BB, Road 6A, and Street E is approximately 625 feet long. A pedestrian connection is provided mid-block (Tract W1)) to connect Street A with Street E.
- In the Northeast and Central phases, the block to the south of Street V is approximately 1,625 feet long. No bicycle/pedestrian connection is provided through the block because the area to the south is wetland and physical access to the wetland is discouraged.
- In the Northeast and Central phases, the block north of Street V and east of Street Y is approximately 1,100 feet long. A pedestrian connection (Tracts NE6 and C6) is provided in alignment with Street Z to connect Street W and Street V.
- In the East phase, the block south of Street A and west of Strobel Road is approximately 825 ft. long. The area to the south is a stormwater facility and a wetland/stream area. No pedestrian/bicycle access is provided in order to discourage physical access to these areas.

D. Pedestrian connections through parking lots shall be physically separated from adjacent vehicle parking and parallel vehicle traffic through the use of curbs, landscaping, trees, and lighting, if not otherwise provided in the parking lot design.

Response: No parking lots are proposed with this application. This criterion is not applicable.

E. Where pedestrian connections cross driveways or vehicular access aisles a continuous walkway shall be provided, and shall be composed of a different paving material than the primary on-site paving material.

Response: All pedestrian connections will be paved.

F. Pedestrian walkways shall have a minimum of five (5) foot wide unobstructed clearance and shall be paved with scored concrete or modular paving materials. In the event that the Americans with Disabilities Act (ADA) contain stricter standards for any pedestrian walkway, the ADA standards shall apply.

Response: All pedestrian walkways will be constructed to a minimum width of 5 feet and provide unobstructed conveyance for all, including those with disabilities.

4. Street frontages and parking areas.

A. Surface parking areas abutting a public street shall provide perimeter parking lot landscaping which meets one of the following standards:[...]

Response: No surface parking areas abutting public streets are proposed. This criterion is not applicable.

5. Parking area landscaping.

A. Landscaped planter islands shall be required according to the following:

1. Residential uses in residential zones, one for every eight (8) contiguous parking spaces.[...]

Response: There are no proposed locations for contiguous parking within the attached single-family areas of the subdivision. This criterion is not applicable.

6. Off-Street parking frontages in Multiple Use zones.

Response: This application does not propose any Multiple Use Zones. The criterion is not applicable.

7. Sidewalks along streets and primary building elevations in Commercial and Multiple Use zones.

Response: This application does not propose any Multiple Use or Commercial Zones. This criterion is not applicable.

8. Connect on-site buildings, parking, and other improvements with identifiable streets and drive aisles in Residential, Commercial, and Multiple Use zones.

Response: All buildings proposed are oriented with direct connection to identifiable streets and/or alleyways.

9. Ground floor uses in parking structures.

A. Parking structures located on Major Pedestrian Routes shall incorporate one or more active retail or commercial uses other than parking at ground level along the entire portion of the structure fronting onto such routes. Compliance to this standard is not required when a semi-subterranean parking structure is

proposed, provided that the height of such structures, or portions thereof, is not greater than three and one-half (3 1/2) feet above the elevation of the adjoining walkway or sidewalk.

Response: No parking structures are proposed. The criterion is not applicable

60.05.25. Landscape, Open Space, and Natural Areas Design Standards.

Unless otherwise noted, all standards apply in all zoning districts.

3. *Minimum landscape requirements for residential developments consisting of eight (8) or more units of Attached Housing or Compact Detached Housing.*
 - A. *Common open space shall consist of active, passive, or both open space areas, and shall be provided as follows:*
 1. *For developments that are part of a Planned Unit Development, provisions of Section 60.35.15.4. shall apply.*

Response: The development is a Planned Unit Development, and is subject to the provisions of Section 60.35.15.4. Those provisions are addressed below.

8. *Retaining walls. Retaining walls greater than six (6) feet in height or longer than fifty (50) lineal feet used in site landscaping or as an element of site design shall be architecturally treated with contrasting scoring, or texture, or pattern, or off-set planes, or different applied materials, or any combination of the foregoing, and shall be incorporated into the overall landscape plan, or shall be screened by a landscape buffer. Materials used on retaining walls should be similar to materials used in other elements of the landscape plan or related buildings, or incorporate other landscape or decorative features exclusive of signs. If screening by a landscape buffer is utilized, a buffer width of at least five (5) feet is required, landscaped to the B3-High Screen Buffer standards.*

Response: Retaining walls are proposed in several locations throughout the site: the location where Road 8B crosses the resource area in the North phase and the curved portion of Street T in the Central phase (Sheet P4.2); the eastern boundary of the natural resource area in the North phase, the eastern edge of Road 8B south of Tract C4 in the Central phase, to the rear of lots 609 to 612 in the Central phase, and to the rear of lots 623 to 626 in the Central Phase (Sheet P4.3); to the rear of lots 538-539 and 170 north of Tract C7 in the East phase, and at the Street A crossing of the natural resource area in the East phase (Sheet P4.4).

Portions of these retaining walls exceed 6 feet in height or 50 lineal feet in length, as shown on Sheets P4.1 through P4.6, and are subject to this criterion. The subject retaining walls have been incorporated into the overall landscape plan. The applicant proposes the use of mechanically stabilized earth (MSE) walls with texture and/or pattern to minimize the visual impact of the walls. Retaining walls at the drainage crossings may be of a different style (ultra block, cast in place concrete, MSE) depending on final design and structural requirements. See Appendix G and Sheet L4.1. Any walls related to water quality facilities will be designed and planted in accord with Clean Water Services standards.

9. *Fences and walls.*
 - A. *Fences and walls shall be constructed of any materials commonly used in the construction of fences and walls such as wood, stone, rock, or brick, or other durable materials.*
 - B. *Chain link fences are acceptable as long as the fence is coated and includes slats made of vinyl, wood or other durable material. Slat may not be required when visibility into features such as open space, natural areas, parks and similar areas is needed to assure visual security, or into on-site areas in industrial zones that require visual surveillance.*
 - C. *Masonry walls shall be a minimum of six inches thick. All other walls shall be a minimum of three inches thick. [...]*

E. Fences and walls:

- 1. May not exceed three feet in height in a required front yard along streets, except required above ground stormwater facilities fencing which may be four feet in height in a required front yard, and eight feet in all other locations.*
- 2. May be permitted up to six feet in a required front yard along designated Collector and Arterial streets.*
- 3. For detached housing along streets and housing facing common greens and shared courts in Multiple Use zones, 3 feet high fences and walls are permitted in front of the building, and on corner lots abutting a street, along the side of the building. Higher fences and walls are permitted on corner lots along the side of the building beginning within 15 feet of the back end of the building nearest to the property line.*

Response: The applicant proposes the use of Allan Block walls in residential yards with texture and/or pattern to minimize the visual impact of the walls. See Appendix G. Retaining walls are not proposed in a required front yard along streets. No fences are proposed for the attached residential properties at this time.

10. Minimize significant changes to existing on-site surface contours at residential property lines.

Exempting the circumstances listed in Section 60.15.10.2, the following standards shall apply to design review proposals where grading is proposed:

- A. When grading a site within twenty-five (25) feet of a property line within or abutting any residentially zoned property, the on-site surface contours shall observe the following:[...]*

Response: The subdivision is bounded on the north, northeast, and east by farmland zoned Washington County AF-20, to the south by SW Scholls Ferry Road, and to the west by SW Tile Flat Road, which also forms the edge of the Urban Growth Boundary. The site to the east has been approved for development as The Ridge at South Cooper Mountain PUD. The Scholls Heights development will be separated from The Ridge by a public right-of-way, SW Strobel Road. Grading within 25 ft. of the property line has been addressed in 60.15.10 below.

11. Integrate water quality, quantity, or both facilities. Non-vaulted surface stormwater detention and treatment facilities having a side slope greater than 2:1 shall not be located between a street and the front of an adjacent building.

Response: As identified on Sheet P2.0 and Sheets P5.1 through P5.6, several above-ground water quality facilities are proposed (Tracts C1, C3, C20, E8, E20, E22, and NW10). None of these facilities are located between a street and the front of an adjacent building.

12. Natural areas. Development on sites with City-adopted natural resource features such as streams, wetlands, significant trees and significant tree groves, shall preserve and maintain the resource without encroachment into any required resource buffer standard unless otherwise authorized by other City or CWS requirements.

Response: The site contains City-adopted natural resources including streams, wetlands, and upland habitat, and does not contain significant trees or significant tree groves. The attached residential portion of the site is does not encroach into any of those features.

13. Landscape buffering and screening. All new development and redevelopment in the City subject to Design Review shall comply with the landscape buffering requirements of Table 60.05-2. and the following standards. For purposes of this Section, a landscape buffer is required along the side and rear of properties between different zoning district designations. A landscape buffer is required for non-residential land uses and parks in Residential zoning districts. Both buffering standards and side and rear building setback requirements shall be met. Only landscaping shall be allowed in the landscape buffer areas. Buffer areas and

building setback standards are measured from the property line, they are not additive. Where a yard setback width is less than a landscape buffer width, the yard setback width applies to the specified buffer designation (B1, B2, or B3 as appropriate). A landscape buffer width cannot exceed a minimum yard setback dimension. In addition, the buffer area and landscape standard are intended to be continuously applied along the property line, except as authorized under Section 60.05.45.10.

Response: Properties adjacent to the attached dwelling portion of the site are tracts and public streets. No non-residential land uses are proposed. All of the subject properties are within the same planned unit development and are designed to function together regardless of zoning district. This criterion is not applicable.

14. Community Gardens

- A. Fences. Community Gardens shall have a fence constructed of a durable materials commonly used in the construction of fencing. Fences shall be a minimum of four (4) feet in height. Coated chain link may be permitted. Temporary construction fencing, erosion control fencing, tree protection fencing and other temporary fencing materials shall not be permitted.*
- B. Parking. Parking must be available in the general vicinity of the garden, on-street parking spaces may count toward this requirement.*
- C. Size. Community gardens shall not exceed one acre in size.*

Response: A community garden is proposed for Tract N9. As shown on Sheet L3.1, fencing is proposed and will be at least four feet in height. Off-street parking is provided to serve the community garden and dog park to the north. The community garden is less than one acre in size.

60.05.30. Lighting Design Standards. *Unless otherwise noted, all standards apply in all zoning districts.*

- 1. Adequate on-site lighting and minimal glare on adjoining properties.*
 - A. Lighting shall be provided at lighting levels for development and redevelopment in all zoning districts consistent with the City's Technical Lighting Standards.*
 - D. Lighting shall be provided at building entrances.*

Response: Subsections A and D are applicable to this proposal. Subsections B, C, and E are not applicable as no vehicular circulation areas or pedestrian plazas are proposed. On-site lighting will meet the City's Technical Lighting Standards. Each building will have a porch light at the entrance. See Appendix F for lighting details.

2. Pedestrian-scale on-site lighting.

Response: No pedestrian plazas or pedestrian circulation areas are proposed within the attached single-family residential portion of the development. These standards are not applicable.

B. 60.15. LAND DIVISION STANDARDS

60.15.10. Grading Standards.

- 1. Applicability. The on-site surface contour grading standards specified in Section 60.15.10.3. are applicable to all land use proposals where grading is proposed, including land division proposals and design review proposals, as applicable. This Section does not supersede Section 60.05.25. (Design Review) and the exemptions listed in Section 60.15.10.2. will apply equally to design review proposals.*
- 2. Exemptions. The following improvements will be exempted from the on-site surface contour grading standards specified in Section 60.15.10.3.:*
 - A. Public right-of-way road improvements such as new streets, street widening, sidewalks, and similar or related improvements.*

- B. *Storm water detention facilities subject to review and approval of the City Engineer.*
- C. *On-site grading where the grading will take place adjacent to an existing public street right-of-way, and will result in a finished grade that is below the elevation of the subject public street right-of-way; provided such grading is subject to the approval of the City Engineer, who may require appropriate erosion and sediment control mitigation measures.*

Response: The subdivision is bounded on the north and northeast by farmland zoned Washington County AF-20, to the east by the future SW Strobel Road, to the south by SW Scholls Ferry Road, and to the west by SW Tile Flat Road. There is no residentially zoned property abutting the site.

Because a zoning map amendment to apply residential zoning has been submitted concurrent with the subdivision application, the subject site is considered a residentially-zoned property for the purpose of these standards. These standards are applicable where the site property lines abut other properties to the north and northeast, and are not applicable where the site abuts existing or proposed public right-of-way.

The northern site boundary abuts the adjacent property line (the Kobbbe Farm property) for approximately 2,600 ft, and portions of that boundary include public right-of-way (the stub ends of Street A, Street EE, Street FF, a portion of Road 6B. The northeastern site boundary abuts the adjacent property line (the future development on the Bartholemy property) for approximately 1,500 ft and abuts public right-of-way (Strobel Road) for approximately 1,100 ft. See Sheets P4.1 through P4.4 for relevant grading contours.

- 3. *On-site surface contouring. When grading a site within twenty-five (25) feet of a property line within or abutting any residentially zoned property, the on-site surface contours shall observe the following:*
 - A. *0 to 5 feet from property line: Maximum of two (2) foot slope differential from the existing or finished elevation of the abutting property, whichever is applicable.*
 - B. *More than 5 feet and up to and including 10 feet from property line: Maximum of four (4) foot slope differential from the existing or finished elevation of the abutting property, whichever is applicable.*
 - C. *More than 10 feet and up to and including 15 feet from property line: Maximum of six (6) foot slope differential from the existing or finished elevation of the abutting property, whichever is applicable.*
 - D. *More than 15 feet and up to and including 20 feet from property line: Maximum of eight (8) foot slope differential from the existing or finished elevation of the abutting property, whichever is applicable.*
 - E. *More than 20 feet and up to and including 25 feet from property line: Maximum of ten (10) foot slope differential from the existing or finished elevation of the abutting property, whichever is applicable.*

Response: The 3.A-3.E criteria limits grade/slope within five foot increments from the property line, with a maximum 2-foot vertical grade difference within each 5-foot horizontal increment. This results in an equivalent 2 ½ -foot horizontal to 1-foot vertical slope to stay in compliance with the standard, or combination of flatter slopes and walls as long as they do not exceed the total vertical grade difference in each 5-foot increment. A standard 3H:1V slope would meet the grading standard. The graphics included as Appendix K represent our interpretation of the standards and shows the allowable grading areas we are maintaining to keep in compliance with Sections 3.A to 3.E. (*Note, graphic scenarios are labelled A-E but do not correspond with specific grading standard 3. A-E*)

As shown for the northwest corner (adjacent to private drive Kobbbe Lane) and the north property line of the site (Sheets P4.1 and P4.2), grading between 0 and 25 ft. from the northern property line is exempt from standards for improvements for Road 8C, Street EE and hammerhead turnaround, Street FF, and Road 6B. Grading along Tract NW 10 is exempt since adjacent to a proposed stormwater facility, and there is no grading proposed

adjacent to NW9 since it is a natural resource area (wetland/vegetated corridor). Grading at the rear of lots 337-343 (and Tract NW12) will match grade at the property line and provides a maximum 3H:1V slope within 25-feet of the property line which meets criteria 3.A-3.E above.

Grading at the rear of lots 344 to 360 and Tract NW1 will match grade at the property line and provides a maximum 3H:1V slope within 25-feet of the property line which meets criteria 3.A-3.E above. Grading at the north end of Tract N2 adjacent to proposed public Street EE and the hammerhead turnaround will require a short wall (2' maximum height) at the property line or at the back of the PUE to comply with criteria 3.A-3.E above, although a portion of this grading is exempt since it is proposed right-of-way for the new street improvements (hammerhead turnaround). Tracts N3, N4 will match grade at the property line and matches existing slope or will provide a maximum 3H:1V slope within 25-feet of the property line which meets criteria 3.A-3.E above. In some areas, the subject site grading and street cross-sections will be below the adjacent property due to the need to grade for future street connections.

As shown for the north east property line (Sheets P4.3 and P4.4), grading between 0 and 25 ft. from the northeastern property line is exempt for standards for improvements for Road 6B, Street X, Street Z, and Street W and adjacent the proposed Strobel Road extension. Grading at the rear of lots 571-590; Tract NE5; lots 337-343; and Tract NW12 will match grade at the property line and provides a maximum 3H:1V slope within 25-feet of the property line which meets criteria 3.A-3.E above. Grading adjacent to Lots 600, 608, 609, 178, 179 and Tract E27 is being coordinated with adjacent development to the east (Scholls Valley Heights - Bartholemy property) to match the proposed finished grade of each development plan. Since the existing grades in this area exceed the standards in 3.A-E above, the grading (post-development) will not exceed the pre-development slope per section 3.F requirements (below).

F. Where an existing (pre-development) slope exceeds one or more of the standards in subsections 60.15.10.3.A-E, above, the slope after grading (post-development) shall not exceed the pre-development slope.

Response: For grading along the northern portion of the east property line, lot and street grading is being coordinated with adjacent development to the east (Scholls Valley Heights - Bartholemy property) to match the proposed finished grade of each development plan. Since the existing grades in this area exceed the standards in 3.A-E above, the grading (post-development) will not exceed the pre-development slope per section 3.F requirements (below).

G. The on-site grading contours standards above apply only to the property lines of the parent parcel of a development. They do not apply to internal property lines within a development.

Response: The proposed land division has one or more property lines internal to the development. The response to grading standards of Section 60.15.10 have been applied to the perimeter of the overall Scholls Heights at South Cooper Mountain Planned Development boundary.

4. *Significant Trees and Groves. Notwithstanding the requirements of Section 60.15.10.3, above, grading within 25 feet of a significant tree or grove, where the tree is located on- or off-site, shall observe the following:*

Response: There are no significant trees or groves on site. These standards are not applicable.

C. 60.30. OFF-STREET PARKING.

60.30.05. Off-Street Parking Requirements.

Parking spaces shall be provided and satisfactorily maintained by the owner of the property for each building or use which is erected, enlarged, altered, or maintained in accordance with the requirements of Sections 60.30.05. to 60.30.20.

Response: All proposed building lots include sufficient space for available resident off-street automobile and bicycle parking as per Sections 60.30.05 to 60.30.20.

60.30.10. Number of Required Parking Spaces.

Except as otherwise provided under Section 60.30.10.11., off-street vehicle, bicycle, or both parking spaces shall be provided as follows:

1. *Parking Calculation. Parking ratios are based on spaces per 1,000 square feet of gross floor area, unless otherwise noted.*
2. *Parking Categories.*
 - A. *Vehicle Categories. Contained in the table at Section 60.30.10.5. are vehicle parking ratios for minimum required parking spaces and maximum permitted number of vehicle parking spaces to be provided for each land use, except for those uses which are located in the RC-OT zoning district which are governed by Section 60.30.10.6. These requirements reflect the parking requirements of Title 4 of Metro's Regional Transportation Functional Plan.*
 - B. *Bicycle Categories. The required minimum number of short-term and long-term bicycle parking spaces for each land use is listed in Section 60.30.10.5.*

Response: The Scholls Heights at South Cooper Mountain planned development includes 471 new detached single-family dwellings and 205 attached single-family dwellings (43 front-loaded and 168 rear-loaded dwellings). One lot is proposed for future development of up to 275 multifamily units and will be reviewed through a future land use review.

Required vehicle parking spaces were calculated as shown in Table 13 below and as described on Sheets P3.0. No bicycle parking is required for detached or single-family attached dwellings.

Table 13. Required Off-Street Parking Spaces

Residential Use Category	Required Ratio Per Unit	Proposed Ratio Per Unit	Proposed Units	Required Spaces	Proposed Spaces
Detached dwellings	1	1	471	471	1908
Attached dwellings - Front-loaded	1.5 – 1.75	2	100	200	300
Attached dwellings - Rear-loaded	1.5 – 1.75	2	105	210	210
TOTAL			677	887	2418

Although not required, 382 on-street parking spaces are also provided, as calculated on Sheet P3.0 and shown on Sheets P3.1 through P3.6.

8. *Residential Parking Dimensions. For all residential uses, any required parking space shall not be less than 8 1/2 feet wide and 18 1/2 feet long. (See also Section 60.30.15. (Off-Street Parking Lot Design) for other standards.)*

Response: Off-street parking is provided in driveways and garages that will meet the minimum requirements for parking dimensions.

9. *Parking Space Calculation.*

- A. *Multiple Uses.* In the case of multiple uses, the total requirements for off-street vehicle and bicycle parking facilities shall be the sum of the requirements for the various uses computed separately.

Response: There is no shared or multiple-use parking proposed.

10. *Location of Vehicle Parking.*

- A. *All parking spaces provided shall be on the same lot upon which the use requiring the parking is located. Upon demonstration by the applicant that the required parking cannot be provided on the same lot upon which the use is located, the Director may permit the required parking spaces to be located on any lot within 200 feet of the lot upon which the use requiring the parking is located.*

Response: All parking spaces are provided on the same lot as the dwelling, in garages and driveways.

- B. *Except for single-family and duplex dwellings, groups of more than two parking spaces shall be so located and served by an access that their use will require no backing movements or other maneuvering within a street or right-of-way other than an alley.*

Response: The proposed dog park and community garden are served by a parking area that provides adequate area for maneuvering in order to enter the street in a forward motion.

- C. *In R10, R7, R5 and R4 zones parking and loading spaces may be located in side and rear yards and may be located in the front yard of each dwelling unit only if located in the driveway area leading to its garage.*

Response: Parking will generally be located in front yard and located in the driveway area leading to its garage.

- D. *Parking in the front yard is allowed for each dwelling unit in the driveway area leading to its garage. Also, one additional space shall be allowed in that area in front of the required side yard and closest to the driveway subject to the following conditions:[...]*

Response: No requests are made for additional front yard parking spaces.

D. 60.33. PARK AND RECREATION FACILITIES AND SERVICES PROVISION.

60.33.10. Annexation to THPRD.

Except as provided in Section 60.33.15, the approval of a Conditional Use, Design Review or Land Division application for any property located in the City of Beaverton, and not within THPRD's boundaries, shall be conditional on the submittal of a legally sufficient petition to annex the property to THPRD; issuance of building permits shall be delayed until the annexation is effective. Delay of issuance of building permits until after the annexation is effective may be waived as a condition of approval by the review authority if the applicant agrees in writing to pay the appropriate THPRD Systems Development Charge for all building permits issued prior to the effective date of annexation. [ORD 4584; June 2012]

Response: An application to annex the property into the THPRD service boundary was submitted to Washington County on May 24, 2017. The Board of County Commissioners approved the annexation application on August 1, 2017.

E. 60.35. PLANNED UNIT DEVELOPMENT.

60.35.05. Purpose.

It is the purpose of these provisions to allow a Planned Unit Development (PUD) in any City zoning district. Uses or combinations of uses may be developed as a single, integral, functional unit or entity. The PUD provisions

are intended to encourage innovation and creative approaches for developing land while enhancing and preserving the value, character, and integrity of surrounding areas which have developed or are developing under conventional district regulations. This is to be accomplished by using the following development and design principles:

1. *Site design shall use the flexibility afforded by the planned unit development to:*
 - A. *Provide setbacks and buffering through landscape or building design abutting to existing development;*
 - B. *Cluster buildings to create open space and protect natural resources;*
 - C. *Provide for active recreation and passive open space;*
 - D. *Use resource efficient development and building practices that encourage innovative design techniques and construction practices that use energy saving technology.*

Response: The PUD proposal contains extensive natural area networks, buildings oriented for views of passive open space and access to open space, and a connectivity pattern that works with natural topography.

2. *Site design shall maximize the opportunities for diversified architecture and outdoor living environments that respond to the existing site context by exploring design flexibility for siting structures, open spaces, circulation facilities, off-street parking areas, streetscapes, resource conservation, and creation of other site improvements that facilitate efficient use of land and create a comprehensive development plan which is better than that resulting from traditional subdivision development;*

Response: A range of development sites are made possible through this PUD application, from alley-loaded attached single-family to larger lots with views of natural areas that can be home to a variety of architectural styles.

3. *Building architecture including detached residential, shall use innovative design that should consider the context of the existing built and natural environment. Buildings shall be architecturally detailed, and of a size and mass that contribute to a pedestrian-friendly streetscape, and respond to the natural features of the site. Cluster housing, such as Courtyard, Patio, or Cottage development, that groups buildings in areas to maximize open space and preserve significant cultural and natural resources is highly encouraged as are the use of sustainable building materials and practices. The orientation of buildings should promote human scaled and pedestrian friendly environments and maximize solar exposure for passive solar gain;*

Response: The application includes building plans and elevations for expected residential buildings. They are examples of the high quality and attractive visuals that are currently popular in the Northwest. The project, however, will be developed over time in phases. Customer tastes and preferences may shift within the timeframe of full site development. Accordingly, architectural styles could change as well. The development team is committed to design excellence and optimized visual appeal to and from the neighboring properties, paths and open spaces; accordingly any changes would also further the goal of exception and innovative design.

4. *Open space should provide opportunities for active and/or passive recreation that includes preservation of natural and cultural resources. Good site design shall retain and protect special topographic, natural, and environmentally sensitive features and existing Significant Groves and Historical and Individual trees should be retained and protected. Understory and the use of native plant material and sustainable landscape practices are encouraged.*

Response: The proposed development is centered on a network of open spaces, including active and passive recreation areas and the natural resources located on site. A pathway system is included to provide active recreation and access to passive recreation opportunities. Landscaping at or near development properties is documented by the landscape plan shown in Sheets L2.0 through L2.7, including locations and species in a manner consistent with the goals of this section.

60.35.10. Modification of Base Zoning Standards.

1. Permitted Uses.

A. The uses in a PUD shall comply with the Permitted and Conditional Use requirements of the zoning district.

Response: The proposed development includes detached and attached residential dwellings, which are permitted in the R1, R2, R4, R5, and R7 zones.

B. Detached and attached dwellings may be allowed in a PUD provided the overall residential density satisfies the applicable residential density provisions of this Code.

Response: The densities for detached and attached dwellings within this PUD application are greater than the required minimum net densities, and lower than the maximum gross allowable densities as illustrated by Table 14 below.

Table 14. Proposed Residential Densities

Land Use Designation	Proposed Zoning	Gross Residential Acres	Net Residential Acres	Maximum Capacity(Units)	Minimum Density (Units)	Proposed Units	Proposed Density (Units per Net Acre)
High Density*	R-1	12.75	6.50	555	282	216	33
Medium Density	R-4	74.65	21.59	812	235	317	15
	R-2	28.98	11.42	631	248	255	22
Standard Density	R-7	11.15	6.59	69	41	75	11
	R-5	4.62	2.31	40	20	29	13
TOTAL		132.15	48.41	2107	826	892	18

**To be developed in a later phase*

*C. In addition to the accessory uses and structures typical in the zoning district in which the PUD is located, accessory uses approved as a part of a PUD may include, but are not limited to the following:
[...]*

4. Other accessory uses or structures which the Planning Commission finds are designed to serve primarily the residents of the PUD, and are compatible with the neighborhood and to the design of the PUD.

Response: A pathway system and private open space area proposed and are permitted as accessory uses to the proposed PUD development per C.4 above.

2. Density and Lot Dimensions. *Density and building scale shall relate to the surrounding neighborhood development and natural resources by providing massing and architectural compatibility with the surrounding neighborhood.*

Response: The proposed single-family detached and attached dwellings will be a maximum of 40 feet tall (except where adjustments have been requested), similar to anticipated future development to the east and northeast. The future multifamily development will be subject to the standards of the R1 zone, similar to anticipated future development to the east. The proposed density of the development is within the base zone allowances. The proposed development is clustered to protect the significant natural resources on the site. The density and building scale are similar to planned development in the surrounding area.

A. Density Transfers.

Response: No density has been transferred from on-site resource areas.

B. Residential Lot Sizes.

1. *Minimum lot size may be reduced to 50 percent of the minimum land area of the applicable zoning district(s), except as permitted in 60.35.10.3.C.2.*

Response: No lots between 25% and 50% of the minimum area of the applicable zone (Compact Detached Housing) are proposed.

3. *Maximum lot size may not exceed 195 percent of the minimum land area of the applicable zoning district(s) in conformance with the table below unless designated for a future phase, which includes further division of property or development of attached product. When the maximum density for the parent parcel has been achieved or a lot is greater than 195 percent of the base zone, the oversized lot(s) shall include a deed restriction to preclude unintended partitioning or subdividing of such lots in accordance with the requirements of the approved PUD.*

Response: Thirty-six lots exceed 195% of the minimum lot size: 48, 49, 53, 54, 55, 364, 370-374, 390-392, 424, 425, 427, 556-570, 588-591, and 683. Proposed Lot 683 is designated for a future phase and will be developed with multifamily residential units.

4. *A proposed Planned Unit Development shall not result in fewer dwelling units (lower density) than if the subject site were reviewed as a Preliminary Subdivision.*

Response: The proposed PUD contains 677 lots, equal to or greater than if the subject site were reviewed as a Preliminary Subdivision due to the allowances for flexible lot sizes and density averaging. The proposed residential density is approximately 18 dwelling units per net acre, which is made possible by the flexibility provided by the PUD approval process.

3. *Setbacks.*

- A. The dimensional standards for the applicable zoning district as listed in Chapter 20 may be modified through approval of a Planned Unit Development, except for the following situations:*
 1. *For proposed lots abutting the perimeter of the property, the required setbacks shall comply with the standard front and rear setbacks of the parent parcel.*
 2. *Where standard modifications would not promote pedestrian or bicycle connection to the street; support storm water management; or meet fire and building codes.*

Response: As described elsewhere in this narrative, the proposed lots within the subdivision will comply with the front and rear setbacks for the parent parcel.

B. Front Setbacks.

The following shall apply to all lots within a proposed residential development(s); except lots proposed along the perimeter of the subject site, which shall be consistent with Section 60.35.10.3.A.1.

1. *Front setbacks for a residential structure, interior to a Planned Unit Development may be reduced, excluding the garage where the garage door faces the front property line. Structures shall not encroach into a public utility easement.*
2. *All single-family attached and detached garages that face a public or private street shall be setback a minimum of twenty (20) feet from property line. Attached and detached garage door façade(s) shall be set back a minimum of four (4) additional feet from the set back of the front of the building, not including porches, when facing a public or private street. All other garage and carport entrances must*

be set back a minimum of two (2) additional feet when the set back of the front of the building is at least twenty (20) feet

Response: The parcels abutting the perimeter of the proposed development will meet the front setbacks of the parent parcel. The requested setbacks for interior lots are within the ranges represented by Beaverton R1, R2, R4, R5, and R7 zoning districts. The proposed lots within the PUD have been sized to accommodate detached or attached single-family residences, as appropriate, consistent with the requested setback standards. Reductions to the front yard setbacks are proposed as detailed in Table 15 below.

Table 15. Proposed Front Yard Setbacks

	SFR Detached		Front Loaded Townhomes		Rear Loaded Townhomes	
Standard	Required	Proposed	Required	Proposed	Required	Proposed
Front Setback (Building)	10 ft. - R2, R4 15 ft. - R5 17 ft. - R7	10 ft. - R2, R4 10 ft. - R5 15 ft. - R7	10 ft.	NA	10 ft.	10 ft.
Front Setback (Garage)	18.5 ft. - R2 20 ft. - R4, R5, R7	NA	18.5 ft.	NA	NA	NA

C. Rear setbacks.

- Rear setbacks shall be the same as the designated zone for the parent parcel for lots abutting the perimeter of the proposed development excepting alley accessed lots for which rear setbacks may be reduced to four (4) feet for alley-accessed lots with no less than a 20-foot alley width.*
- Garages and carports accessed from both sides of an alley shall be setback a minimum of four (4) feet with no less than 28-feet between garage doors.*

Response: The parcels abutting the perimeter of the proposed development will meet the rear setbacks of the parent parcel. The requested setbacks for internal lots are within the ranges represented by City of Beaverton R2, R4, R5, and R7 zoning districts. The proposed lots within the Scholls Heights at South Cooper Mountain planned development have been sized to accommodate detached or attached single-family residences, as appropriate, consistent with the requested setback standards. Reductions to the rear yard setbacks are proposed as detailed in Table 16 below.

Table 16. Proposed Rear Yard Setbacks

	SFR Detached		Front Loaded Townhomes		Rear Loaded Townhomes	
Standard	Required	Proposed	Required	Proposed	Required	Proposed
Rear building setback (northern property line)	20 ft.	NA	20 ft.	NA	20 ft.	NA
Rear building setback (elsewhere)	18.5 ft. - R2 20 ft. - R4, R5 25 ft. - R7	15 ft.	18.5 ft.	15 ft.	18.5 ft.	15 ft.
Rear garage setback	NA	NA	NA	NA	5 ft.	4 ft.

- D. Side setbacks. Except for zero-lot line development, side setbacks internal to the Planned Unit Development, shall be a minimum of three (3) feet with a total of six (6) feet between two buildings. In no case shall a building encroach into a Public Utility Easement (PUE). All zero-lot line development*

shall have side yard setbacks of 10 feet on one side of the dwelling unit and no setback required on the opposite side.

Response: The requested setbacks are within the ranges represented by Beaverton R2, R4, R5, and R7 zoning districts. The proposed lots within Scholls Heights at South Cooper Mountain subdivision have been sized to accommodate detached or attached single-family residences, as appropriate, consistent with the requested setback standards. Reductions to the side yard and street side yard setbacks are proposed as detailed in Table 17 below.

Table 17. Proposed Side Yard Setbacks

	SFR Detached		Front Loaded Townhomes		Rear Loaded Townhomes	
Standard	Required	Proposed	Required	Proposed	Required	Proposed
Side yard setback	5 to 10 ft.	3.5 ft.	5 to 10 ft.	3.5 ft.	5 to 10 ft.	3.5 ft.
Street side yard setback	10 ft.	NA	10 ft.	NA	10 ft.	8 ft. - lots 214, 222

60.35.15. Open Space.

Open space shall provide opportunities for active and/or passive recreation and may include existing stands of trees, resource areas, and storm water facilities as outlined in this section. Active open space shall allow human activities including recreational and social opportunities such as play fields, playgrounds, swimming pools, plazas and other recreational facilities. Open space may also be passive and include human activities limited to walking, running, and cycling, seating areas and wildlife viewing or natural areas such as a wetland.

- 1. A Planned Unit Development shall provide baseline open space of an area equal to at least twenty percent (20%) of the subject site.*
- 2. Exemptions. Properties within the South Cooper Mountain Community Plan Area are exempt from the open space requirements in Section 60.35.15.1, but shall provide all community features, including but not limited to, trails, habitat benefit areas, and scenic views identified in the South Cooper Mountain Community Plan, as identified in Section 60.35.25.*

Response: Due to location within the South Cooper Mountain Community Plan Area, this application is exempt from the 20% minimum open space requirement. See responses to the policies of the South Cooper Mountain Community Plan in Section IV for demonstration of required open space elements from the community plan.

The SCM Community Plan identifies a number of community features on the site including natural resource areas, a neighborhood park, and bicycle/pedestrian trails. As shown on Sheet L1.0, 31.8 acres of open space have been provided, which exceeds the 14.14 acres required, and 8.59 acres (or 27.4%) is active open space, which exceeds the 3.54 acres required (25% of required open space).

- 3. Open Space Standards. Open space shall be land that is available for the creation of active and/or passive areas, or resource areas that provide visible and accessible open space to the proposed community.*

Response: The proposed development includes a combination of active and passive open space areas that are located along streets and pathways that provide visibility and accessibility to the community.

- A. The following resource areas may count towards passive open space requirements: Significant trees and/or groves, habitat benefit areas, view corridors, steep slopes, water quality facilities, environmentally sensitive areas including wetlands and any buffers required by Clean Water Services or other regulatory body, and other resources as deemed appropriate by the decision maker.*

Response: The proposed development includes on-site resource areas. These resource areas will serve as passive open space for the development as shown in Table 18 below and on Sheets L1.0 and L2.0-L2.7

Table 18. Passive Open Space

Phase	Resource Area	Tract	Area (acres)	Purpose
Central	Water quality facility	C1	0.80	Treatment of stormwater while providing visually attractive landscaping.
Central	Water quality facility	C3	0.82	
Central	Water quality facility	C20	0.59	
East	Water quality facility	E8	0.96	
East	Water quality facility	E20	1.30	
East	Water quality facility	E22	0.76	
Northwest	Water quality facility	NW10	1.48	
Central	Wetland/vegetated corridor	C2	1.44	CWS wetland and vegetated corridor.
Central	Wetland/vegetated corridor	C10	2.07	
East	Wetland/vegetated corridor	E9	2.82	
East	Wetland/vegetated corridor	E21	1.68	
North	Wetland/vegetated corridor	N8	2.00	
Northwest	Wetland/vegetated corridor	NW9	1.23	
Total			17.95	

B. Open space shall be easily accessible, physically or visually, to all members of the planned community via a minimum thirty (30) foot wide street frontage or access easement;

Response: Open space is accessible via a variety of means. The active open spaces are easily accessed from paths or public roadways, both physically and visually. The habitat areas are intended for visual access only, from pathways and public streets. With the exception of some of the passive open space areas that provide pedestrian walkways between blocks and are designed to multi-use trail standards, open spaces have street frontage of at least 30 feet.

C. No more than sixty (60) percent of the gross land dedicated to active open space may have slopes greater than five (5) percent. Additional reductions to this standard may be granted by the Planning Commission based on the context of the proposed amenities and existing site conditions.

Response: The proposed site plan includes 31.8 acres of open space, which exceeds the required 14.14 acres. Per E below, 25% (or 3.54 acres) of the overall required open space is required to be active open space; less than 60% of the dedicated active open spaces has slopes greater than 5%, which is below this threshold.

D. Open space areas shall have a dedicated meter and underground irrigation system to ensure adequate water supply during establishment period (3-years) and during periods of drought for all newly planted areas. Resource areas are exempt from this criterion.

Response: Open spaces, with the exception of CWS wetlands and buffer areas, will contain necessary irrigation systems to ensure establishment and sustainability of vegetation.

E. For developments ten (10) acres or greater, at least twenty-five (25) percent of the total required open space area shall be active open space and subject to the provisions of 60.35.15.4.

Response: The proposed development is greater than 10 acres in area, and this standard is applicable. Of the 14.14 acres of required open space, 25% (or 3.54 acres) must be active open space. The proposed development provides 31.8 acres of open space and active open space that exceeds the minimum requirement as shown in Sheets L1.0 and L2.0-L2.7 and Table 19 below.

Table 19. Active Open Space Provided

Phase	Description	Tract(s)	Zone	Minimum Lot Size	Area (sf)	Area (acres)
East	Pocket park with a decorative stone wall/bench, turf area, and ornamental plantings.	E25	R5	5,000	11,189	0.26
North	Pocket park with play structure, shelter and tables, and turf area.	NE2	R2	2,000	37,298	0.86
Central	Neighborhood park with a Little League Baseball field; bleachers; playground with play structures; a half basketball court; and turf area.	C11	R4	4,000	124,470	2.86
North	Fenced dog park with benches and a shelter; sand volleyball court; and fenced community garden with raised beds, picnic tables, and shelter and tool shed.	N9	R4	4,000	38,390	0.88
Northwest	Pocket park with a shade structure with tables, play structure, benches, and turf area.	NW7	R2	2,000	19,292	0.44
Northeast/Central	Walkway connection between Street W and Street V; the walkway terminates in a viewpoint at the eastern end.	NE6/ C6	R7/ R4	7,000/ 4,000	2,226/ 2,484	0.11
Central	Walkway connection between Street V and Road 6B.	C5 & C4 (partial)	R4	4,000	6,915	0.16
West/Northwest	Multi-Use pathway along Tile Flat Road	NA	NA	NA	46,566	1.07
South/Central/ North/Northeast	Community Trail & 5 Fitness Trail Stations. Fitness Trail Stations are located adjacent to Tracts E10, C11, C17, N9, and N5. Each Fitness Trail Station has a different fixed item to exercise different parts of the body.	NA	NA	NA	54,294	1.25
Provided					338,414	7.88

F. For the purpose of this Code, open space does not include:

- 1. Public or private streets;*
- 2. Surface parking lots or paved areas not designated for active or passive recreation;*

3. *Private lots and buildings including setbacks or landscape buffers. However, community buildings, community rooms, or both developed for the common use and ownership of the residents within a Planned Unit Development may be counted as open space.*
4. *Vehicular access driveways or maneuvering areas.*

Response: This proposal does not consider the above areas to be open space. No community buildings or community rooms are proposed with Phase 1 of the development. Phase 2 will likely contain community rooms for the use of the residents of the future multifamily development.

4. *Active Open Space. Active open space areas are ~~outdoor~~ common areas that may be gathering spots, community rooms, play areas, overlooks, or any that consist of active uses for owners, residents, or the community at large. Active open space shall meet the following criteria: [ORD 4654; March 2015]*
 - A. *Active open space that is provided outdoors shall be no smaller than the minimum lot size requirement of the underlying zoning district with a minimum width 40 feet. For properties in multiple use zoning districts with no minimum lot size active open space areas shall be a minimum of 5,000 square feet in area. The Planning Commission may modify this requirement to accommodate trails, overlooks, and other types of recreational features which serve the residents of the development.*

Response: The proposed active open space areas are outdoor areas located in the R7, R5, R4, and R1 districts and exceed the minimum lot sizes of each, with the exception of Tracts NE6 & C6, a walkway that terminates in a viewpoint. See Table 20 below and Sheets P2.0-P2.7 for details.

Table 20. Active Open Space Sizes

Phase	Description	Tract(s)	Zone	Minimum Lot Size	Area (sf)	Area (acres)	Notes
East	Pocket park with a decorative stone wall/bench, turf area, and ornamental plantings.	E25	R5	5,000	11,189	0.26	Meets minimum
North	Pocket park with play structure, shelter and tables, and turf area.	NE2	R2	2,000	37,298	0.86	Meets minimum
Central	Neighborhood park with a Little League Baseball field; bleachers; playground with play structures; a half basketball court; and turf area.	C11	R4	4,000	124,470	2.86	Meets minimum
North	Fenced dog park with benches and a shelter; sand volleyball court; and fenced community garden with raised beds, picnic tables, and shelter and tool shed.	N9	R4	4,000	38,390	0.88	Meets minimum
Northwest	Pocket park with a shade structure with tables, play structure, benches, and turf area.	NW7	R2	2,000	19,292	0.44	Meets minimum

Northeast/Central	Walkway connection between Street W and Street V; the walkway terminates in a viewpoint at the eastern end.	NE6/ C6	R7/ R4	7,000/ 4,000	2,226/ 2,484	0.11	Walkway connection
Central	Walkway connection between Street V and Road 6B.	C5 & C4 (partial)	R4	4,000	6,915	0.16	Meets minimum
West/Northwest	Multi-Use pathway along Tile Flat Road	NA	NA	NA	46,566	1.07	Meets minimum
South/Central/ North/Northeast	Community Trail & 5 Fitness Trail Stations. Fitness Trail Stations are located adjacent to Tracts E10, C11, C17, N9, and N5. Each Fitness Trail Station has a different fixed item to exercise different parts of the body.	NA	NA	NA	54,294	1.25	Meets minimum

The applicant requests that the Planning Commission modify the minimum open space lot size in the R7 and R4 zones to allow the smaller Tracts NE6 and C6 that makes up the walkway.

B. Active open space may abut a Collector or greater classified street as identified in the City's adopted Functional Classification Plan, when separated from the street by a constructed barrier, such as a fence or wall, at least three (3) feet in height.

Response: The proposed multi-use and community trails do not abut the collector roads on site. This standard is not applicable.

C. Active Open Space shall be physically accessible to all residents of the development.

Response: All of the proposed active open space areas are physically accessible to all residents of the development through sidewalk and pedestrian connections that meet ADA standards. Tracts NE6 and C6 include stairs, which are necessary due to the significant topography in this area of the site.

D. Active open space shall include physical improvements to enhance the area. Physical improvements may include; benches, gazebos, plazas, picnic areas, playground equipment, sport courts, swimming/wading pools, indoor clubhouses or meeting facilities, play fields, or other items permitted by the Planning Commission.

Response: As described in Table 19 above, each of the proposed active open spaces includes physical improvements including sport courts, play structures, benches, play fields, gazebos, and community garden beds. The multi-use/community trail includes five fitness stations that provide opportunities for full-body exercise. Each fitness station will include a fixed piece of equipment with specific suggested exercises. See Sheets L3.1-L3.3 for equipment details.

E. Floor area within buildings devoted to common uses which serve the residents of the development, such as indoor pools, game rooms, or community rooms, may be counted towards Active Open Space requirements based on the total floor area devoted to such uses.

Response: This application does not include buildings with devoted common uses. A common use building may be included in a future Design Review application for the multi-family development.

5. Maintenance and Ownership. Land shown on the final development plan as common open space, and landscaping and/or planting contained therein shall be permanently maintained by and conveyed to one of the following:[...]

Response: Covenants, Conveyances and Restrictions (CC&R) and/or Home Owners Association (HOA) policies and responsibilities will be established for the final plat. The HOA will take ownership of common open spaces and be responsible for permanent maintenance.

60.35.20. Building Architecture.

1. Purpose. This section applies to development which is not subject to Section 60.05.(Design Review) of this code.

Response: The proposed 205 attached single-family lots are subject to Section 60.05 of this code and are not addressed here. This section applies to the 471 new detached single-family dwellings.

2. Building Orientation. Buildings shall be oriented to the street or other public spaces such as parks, plazas, courtyards and open commons when served by an alley. The orientation of buildings shall promote environments that encourage walking, social interaction, and safety.

Response: All proposed buildings are oriented toward public streets.

A. Exceptions to this standard may be allowed by the Planning Commission where access, topography, and natural resources prohibit the orientation of buildings to the street or other public open spaces.

Response: No exceptions to this standard are requested.

B. In all cases buildings and or private lots shall be served by or have direct access to sidewalks or paths that connect to a private or public street/sidewalk system.

Response: All lots abut and have direct access to sidewalks and/or paths.

C. Garages with rear alley access or garages located in the rear of the lot with shared driveways are encouraged.

Response: Rear alley garages are proposed within the attached single-family area of the site; no rear garages are proposed for detached homes.

D. All buildings shall have their primary entrance to a street or publicly accessible sidewalk where buildings face public parks, common areas or open space.

Response: All buildings have their primary entrance oriented toward a public street or publicly accessible sidewalk. Some homes face a common green and the entrances are connected to a public sidewalk by a walkway.

E. *All primary entrances shall be covered or recessed with a minimum depth of three (3) feet deep and five (5) feet wide.*

Response: All primary entrances are covered for weather protection and building aesthetics and are a minimum of 3 feet by 5 feet as shown on the Architectural Sheets.

3. *Building Heights. Buildings shall be to scale with similar types of existing structures on adjacent properties. This can be accomplished by utilizing graduated building heights which offer a transition between single-story residential development and multiple-story residential.*
- A. *Maximum building height standards may be increased up to twelve feet (12') when the applicable building setback distance along the perimeter of the parent parcel is increased at a ratio of 1.5 additional feet of setback for every foot of building height over the base zone standard for building height.*
- B. *For the South Cooper Mountain Community Plan area, structures that do not abut the exterior boundary of the plan area, may be allowed to vary building heights, without satisfying the graduated building height transitions of Section 60.35.20.3 in order to provide for a variety in housing types within developments.*

Response: The site is located within the South Cooper Mountain Community Plan area, and abuts the exterior boundary of the plan area along SW Scholls Ferry Rd, SW Tile Flat Rd, and the Urban Reserves to the North.

A number of the lots in the northern, northeastern, and eastern portion of the site are steeply sloped, with slopes in excess of 10%. These are areas where existing topography is steep and development requires either garage under or daylight basement housing types to step the housing down the slopes. This type of housing exceeds the maximum 35 foot height in the R5 and R7 zones where it is located.

A building height increase is also requested for lots in the R2 and R4 zones and Lot 677 in the R1 zone to account for varying topographies on the site. Lot 677 will be separated from the lower-density R4 residential areas to the east by a vegetated corridor, and will be adjacent to attached single-family development in the R2 zone to the east.

An increase in maximum building height standards is requested for the following lots as shown in Table 21 below:

Table 21. Requested Building Height Increases

Zone	Lot numbers	Standard Height Maximum	Requested Height Maximum
R1	677	60 feet	72 feet
R2	15-42, 428-488, 504-519, 627-654	40 feet	52 feet
R2	390-397	40 feet	47 feet
R4	398-410, 556-566	35 feet	47 feet
R5	164-168, 185-188	35 feet	47 feet
R7	170-182, 540-551, 592-599, 609-619	35 feet	47 feet

One the lots identified in Table 20 about the exterior boundary of the plan area: Lot 683 (the future multifamily parcel). A height increase of 12 ft. has been requested for this lot, which would require an additional 18-ft. setback. Lot 683 is located within the R-1 zone at the corner of SW Scholls Ferry Road and SW Tile Flat Rd; buildings on the site are subject to a 10-ft. setback from each. In order to achieve a 12-ft. height increase, a setback of 28 ft. would be required. As illustrated in Sheet P3.7, the proposed setback from SW Scholls Ferry Rd is 98 ft. and the proposed setback from SW Tile Flat Rd is 172 ft. This setback will be confirmed through a future Design Review application.

C. Graduated building height standards shall not apply where existing structures on adjacent properties are rural in their development or use.

Response: The site is located within the South Cooper Mountain Community Plan area, adjacent to properties developed for rural use. The provisions of 3.C are not applicable, but are superceded by the provisions of 3.B.

4. *Architectural Standards. Architectural standards are intended to promote quality design and detail that promote innovation and creativity that allows for a variety of building styles and types. The following standards apply to all single-family developments proposed through the PUD process. Attached residential structures, Compact Detached Housing, and commercial, industrial, and multiple use buildings are subject to the Design Standards or Guidelines of Section 60.05 of the Development Code. [ORD 4654; March 2015]*

Response: The 471 proposed attached residential structures are subject to the Section 60.05. The 205 proposed detached residential structures are subject to the provisions of this section.

A. Building scale and massing shall complement surrounding uses by complying with the provisions in this Code and meeting the following criteria for residential development.

Response: The Scholls Heights at South Cooper Mountain PUD will be developed with high-quality dwellings that complement surrounding uses by meeting the requirements of the code and the criteria of this section. These dwellings will use common Northwest architectural styles such as Craftsman, English Revival, and Colonial. The house types have been selected for appropriate scale and mass.

B. Front façade elevations shall not be repeated on adjacent lots along the same street frontage.

Response: Sheets P3.0 through P3.7 demonstrate the proposed location of home styles. Six different detached dwelling types are proposed, with a total of 13 potential facade designs, are proposed, and they will not be repeated on adjacent lots along the same street frontage.

C. All detached residential structures shall include design elements that provide building articulation, continuity of form and variety. Architecture should avoid long expanses of uninterrupted building surfaces. Buildings shall incorporate at least six (6) of the following building elements on the front, rear, common open space, and street facing elevations and four (4) of the following elements on interior side yard elevations: [...]

Response: Each of the proposed detached residential structures will include at least 6 of the listed elements on the front, rear, and street facing elevations and 4 of the listed elements on interior side yard elevations as illustrated in the Architectural Sheets. No alternative features are requested.

- D. *Building elevation is measured as the horizontal plane between the lowest plate line and the highest plate line of any full or partial building story containing doors, porches, balconies, terraces and/or windows.*
- E. *Alternative building design may reflect modern building form and style. These styles may have less detail or ornamentation but shall have demonstrated successful use of materials and form, and a cohesive architectural style and be approved by the Planning Commission.*

Response: The building elevation measurement has been applied to the proposed buildings and lots, and has resulted in a request for building height modification requests for steep lots. No alternative building designs are requested.

60.35.25. South Cooper Mountain Community Plan

The South Cooper Mountain Community Plan is part of the Comprehensive Plan for the City of Beaverton. It provides regulatory policies and maps, along with descriptions and illustrations of the context for those policies and maps, for 544 acres within the southwestern area of the City of Beaverton. This section of the Development Code of the City of Beaverton outlines specific implementation requirements and connections to the policies of the South Cooper Mountain Community Plan.

- 1. *Proposals within the South Cooper Mountain Community Plan area shall demonstrate compliance with the following applicable South Cooper Mountain Community Plan policies and figures:*

Response: Compliance with the standards of the South Cooper Mountain Community Plan is addressed in Section IV of this narrative.

- 2. *Proposals within the South Cooper Mountain Community Plan area shall demonstrate compliance with the following applicable Comprehensive Plan policies and figures:*

Response: Compliance with the policies of the Comprehensive Plan is addressed in Section III of this narrative.

F. 60.45. SOLAR ACCESS PROTECTION.

60.45.10. Solar Access for New Development.

- 2. *Applicability. The solar design standard in subsection 3., below, shall apply to subdivisions and partitions in the R10, R7 and R5 zones, except to the extent the Director finds that the applicant has shown one or more of the conditions listed in subsections 4. and 5., below, exist, and exemptions or adjustments provided for therein are warranted.*

Response: There are five zones within Scholls Heights at South Cooper Mountain, including R7 and R5 zones. The R7 and R5 zones are located in the eastern portion of the site and are subject to these standards. The remaining portions of the site contain land zoned R1, R2 and R4 and are not subject to these standards.

- 3. *Design Standard. At least 80 percent of the lots in a development subject to this ordinance shall comply with one or more of the options in this section.*
 - A. *Basic Requirement (see Figure 9). A lot complies with this Section if it:*
 - 1. *Has a north-south dimension of 90 feet or more; and*
 - 2. *Has a front lot line that is oriented within 30 degrees of a true east-west axis.*

Response: The R5 and R7 zoned areas of the subdivision are located on land that is generally sloping toward the south and west. Slopes in these areas range from 3% in the south to more than 20% in the north. See Sheet P3.8. In addition, the South Cooper Mountain Community Plan calls for a new collector road that borders these areas of the site on the south. This collector road crosses the site in a serpentine manner from southeast to

northwest. As a result, a typical block pattern that enables lots oriented along, or within 30 degrees of a north-south axis, is somewhat limited.

Of the 104 proposed lots within the R5 and R7 zones, 29.8% of the proposed lots satisfy the basic solar lot design standards of this section (designated as B on Sheet P3.8). Adjustments for the remainder are requested due to the road location (A-R), slope (A-S), and natural features (A-F).

B. Protected Solar Building Line Option (see Figure 10). In the alternative, a lot complies with this Section if a solar building line is used to protect solar access as follows:

- 1. A protected solar building line for the lot to the north is designated on the plat, or documents recorded with the plat; and*
- 2. The protected solar building line for the lot to the north is oriented within 30 degrees of a true east-west axis; and*
- 3. There is at least 70 feet between the protected solar building line on the lot to the north and the middle of the north-south dimension of the lot to the south, measured along a line perpendicular to the protected solar building line; and*
- 4. There is at least 45 feet between the protected solar building line and the northern edge of the buildable area of the lot, or habitable structures are situated so that at least 80 percent of their south-facing wall will not be shaded by structures or non-exempt vegetation.*

Response: In the case of lots oriented generally east-west, this approach would require spacing from building roof center to neighboring building roof center of 70 feet. At that dimension the standard could be applied to R5 and R7 lots that were at least 70 feet wide. The proposed R5 and R7 properties are less than 70 feet wide, partially in an attempt to achieve the density goals of the South Cooper Mountain Community Plan while simultaneously preserving the stream and natural area buffers. On lots oriented generally north-south, this approach would not preserve sufficient buildable areas on the lots to the north. Accordingly, this proposal does not including application of the alternate standard.

C. Performance Option. In the alternative, a lot complies with this Section if:

- 1. Habitable structures built on that lot will have their long axis oriented within 30 degrees of a true east-west axis and at least 80% of their ground floor south wall protected from shade by structures and non-exempt trees; or*
- 2. Habitable structures built on that lot will have at least 32% of their glazing and 500 square feet of their roof area which faces within 30 degrees of south and is protected from shade by structures and non-exempt trees.*

Response: The narrow nature of the proposed lots, combined with topography precludes this application from utilizing this option.

- 4. Exemptions from Design Standard. A development is exempt from this Section if the Director finds the applicant has shown that one or more of the following conditions apply to the site. A development is partially exempt from this Section to the extent the Director finds the applicant has shown that one or more of the following conditions apply to a corresponding portion of the site. If a partial exemption is granted for a given development, the remainder of the development shall comply with this Section.*
 - A. Slopes. The site or a portion of the site for which the exemption is sought, is sloped 20 percent or more in a direction greater than 45 degrees east or west of true south, based on a topographic survey by a licensed professional land surveyor.*

Response: A relatively small portion of the site that is subject to these standards contains slopes greater than 20%, which meets this standard for exemption. Under this standard, 2 lots would be exempt.

5. *Adjustments to Design Standard*

A. *Density and Cost* If the design standard in this Section is applied, either the resulting density is less than that proposed, or on-site site development costs (e.g. grading, water, storm drainage and sanitary systems, and roads) and solar related off-site site development costs are at least 5% more per lot than if the standard is not applied. The following conditions, among others, could constrain the design of a development in such a way that compliance with this Section would reduce density or increase per lot costs in this manner. The applicant shall show which if any of these or other similar site characteristics apply in an application for a development.

Response: An adjustment to the design standard is requested, as described in the responses to subsection A.1-4 below. The requested adjustment is a reduction in the required number of lots meeting the standards of subsection 4 above from 80% to 29.8%. See Sheet P3.8 for an illustration of the lots described below.

1. *The portion of the site for which the adjustment is sought has a natural grade that is sloped 10 percent or more and is oriented greater than 45 degrees east or west of true south based on a topographic survey of the site by a professional land surveyor*

Response: A portion of the site that is subject to these standards is sloped more than 10% in a direction greater than 30 degrees east/west of true south and meets this standard. This area contains 31 lots.

2. *There is a significant natural feature on the site, identified in the comprehensive plan that prevents given streets or lots from being oriented for solar access, and it will exist after the site is developed.*

Response: The site contains an identified wetland, Wetland W-G, and associated riparian and buffer areas. These features are identified in the South Cooper Mountain Community Plan, which is part of the Comprehensive Plan, and further identified by the adopted LWI for this area. In addition, the site contains a distinct high point in the R5 and R7 zoned areas. This area is described in the South Cooper Mountain Community Plan. Development is planned in this area, however the existing topographical constraints will remain.

The location and orientation of these natural features have determined the route and location of Collector Road 8B and Streets C, V and W.

3. *Existing road patterns must be continued through the site or must terminate on-site to comply with applicable road standards or public road plans in a way that prevents given streets or lots in the development from being oriented for solar access.*

Response: The South Cooper Mountain Community Plan identifies two roads that must continue through the site: the new north-south collector (Road 8B) and the expansion and construction of a new north-south neighborhood collector along the route of the existing SW Strobel Road and driveway to its north. The R5 and R7 lots on the site are located to the west of SW Strobel Road and to the north of the proposed Collector (Road 8B). The orientation of SW Strobel Road along a portion of the eastern property boundary and the Collector Road along the southern boundary hinders the creation of lots that meet the solar orientation requirements.

4. *An existing public easement or right-of-way prevents given streets or lots in the development from being oriented for solar access. [ORD 4071; November 1999]*

Response: The South Cooper Mountain Community Plan identifies two roads that must continue through the site: the new north-south collector (Road 8B) and the expansion and construction of a new north-south neighborhood collector along the route of the existing SW Strobel Road and driveway to its north. The R5 and R7 lots on the site are located to the west of SW Strobel Road and to the north of the proposed Collector (Road 8B). The orientation of SW Strobel Road along a portion of the eastern property boundary and the Collector Road along the southern boundary hinders the creation of lots that meet the solar orientation requirements.

G. 60.55. TRANSPORTATION FACILITIES.

60.55.10. General Provisions.

1. *All transportation facilities shall be designed and improved in accordance with the standards of this code and the Engineering Design Manual and Standard Drawings. In addition, when development abuts or impacts a transportation facility under the jurisdiction of one or more other governmental agencies, the City shall condition the development to obtain permits required by the other agencies.*

Response: The transportation facilities proposed for Scholls Heights at South Cooper Mountain reflect the South Cooper Mountain Community Plan and are designed in accordance with the City of Beaverton's Engineering Design Manual and standard drawings.

The proposed development abuts SW Scholls Ferry Road and SW Tile Flat Road, both of which are both Washington County transportation facilities and the Urban Growth Boundary (UGB). As per 60.55.10(1) it is understood that the City will condition the development to obtain permits required by Washington County.

2. *In order to protect the public from potentially adverse impacts of the proposal, to fulfill an identified need for public services related to the development, or both, development shall provide traffic capacity, traffic safety, and transportation improvements in rough proportion to the identified impacts of the development.*

Response: To ensure that the public is protected from adverse impacts related to traffic this application includes a proposed internal roadway network, based on the South Cooper Mountain Community Plan that will appropriately facilitate internal and pass through traffic.

Additionally, Kittelson & Associates, Inc. have prepared a TIS (included as Impact Study E) and propose the following recommendations to address traffic impacts to offsite facilities:

- Per prior traffic impact studies approved for River Terrace and South Cooper Mountain, Washington County should continue to monitor the SW Scholls Ferry Road/SW 175th Avenue/SW Roy Rogers Road intersection to determine if, and when, additional modifications are needed beyond those currently planned for construction through MSTIP funding.
- West Hills should widen SW Scholls Ferry Road to provide two westbound through lanes from the eastern property boundary of The Ridge at South Cooper Mountain to SW Tile Flat Road. At the SW Tile Flat Road intersection, the northern-most through lane should be striped as a westbound right-turn lane. As part of this improvement, a westbound right-turn traffic signal overlap should be provided at the signalized intersection.
- West Hills should widen SW Scholls Ferry Road to provide two eastbound through lanes from SW Tile Flat Road through the SW Strobel Road intersection. To the east of SW Strobel Road, the eastbound direction should taper to one through lane.

- West Hills should widen SW Tile Flat Road to provide a 3-lane cross-section from the northern boundary of the Scholls Heights property to the SW Scholls Ferry Road intersection. The southbound approach at SW Scholls Ferry Road should be striped as a left turn and a shared left/through/right lane.
 - The southbound SW Strobel Road approach at the intersection with SW Scholls Ferry Road should be striped to include a left-turn lane and a shared left/through/right lane.
 - A signal should be installed at the intersection of SW Scholls Ferry Road and SW Strobel Road.
 - West Hills should locate and maintain all future landscaping, above-ground utilities, and site signage to ensure minimum required sight lines are provided at all intersections within the Scholls Heights at South Cooper Mountain neighborhood.
3. *For applications that meet the threshold criteria of section 60.55.15. (Traffic Management Plan) or of section 60.55.20. (Traffic Impact Analysis), these analyses or limited elements thereof may be required.*

Response: The proposed development is predicted to produce 8,558 total daily trips at buildout. Accordingly a Traffic Impact Analysis (as per section 60.55.20) has been developed. See Impact Study E.

7. *Intersection performance shall be determined using the Highway Capacity Manual 2000 published by the Transportation Research Board. The City Engineer may approve a different intersection analysis method prior to use when the different method can be justified. Terms used in this subsection are defined in the Highway Capacity Manual 2000....*

Response: The Traffic Impact Analysis utilized the Highway Capacity Manual 2000 for analysis and employed the City's standards above. It resulted in a series of recommendations for improvements to roadways, access and capacity.

60.55.20. Traffic Impact Analysis.

For each development proposal that exceeds the Analysis Threshold of 60.55.20.2, the application for land use or design review approval shall include a Traffic Impact Analysis as required by this code. The Traffic Impact Analysis shall be based on the type and intensity of the proposed land use change or development and its estimated level of impact to the existing and future local and regional transportation systems.

1. *Engineer Certification. The Traffic Impact Analysis shall be prepared and certified by a traffic engineer or civil engineer licensed in the State of Oregon.*

Response: The traffic analysis was developed by Julia Kuhn, PE, and Chris Brehmer, PE, with Kittelson & Associates, engineers licensed in the State of Oregon.

2. *Analysis Threshold.*

- A. *A Traffic Impact Analysis is required when the proposed land use change or development will generate 200 vehicles or more per day (vpd) in average weekday trips as determined by the City Engineer.*
- B. *A Traffic Impact Analysis or some elements of a Traffic Impact Analysis may be required when the volume threshold under subsection A. of this section is not met but the City Engineer finds that the traffic impacts attributable to the development have the potential to significantly impact the safe and efficient operation of the existing public transportation system.*

Response: The project is expected to generate 8,558 trips per day. Accordingly, the analysis threshold has been met and the required Traffic Impact Analysis has been developed. See Impact Study E.

1. *Study Area. The Traffic Impact Analysis shall evaluate the Area of Influence of the proposed development and all segments of the surrounding transportation system where users are likely to experience a change in the quality of traffic flow. The City Engineer may identify additional locations for study if existing traffic operation, safety, or performance is marginal or substandard. Prior to report preparation, the applicant shall submit the proposed scope and analysis assumptions of the Traffic Impact Analysis. The City Engineer shall determine whether the scope and analysis assumptions are adequate.*

Response: As described in the Traffic Impact Analysis, the Area of Influence of the proposed development was evaluated. Kittelson & Associates submitted the proposed scope and analysis assumptions to the City Engineer and Washington County prior to conducting the analysis.

4. *Contents of the Traffic Impact Analysis Report. The Traffic Impact Analysis report shall contain the following information organized in a logical format:*
 - A. *Executive Summary*
 - B. *Description of Proposed Development*
 - C. *Existing Conditions*
 - D. *Traffic Forecasts*
 - E. *Traffic Impacts*
 - F. *Mitigation Identification*
 - G. *Recommendations*

Response: The Traffic Impact Analysis was developed by Kittelson & Associates and contains the listed information.

60.55.25. Street and Bicycle and Pedestrian Connection Requirements.

1. *All streets shall provide for safe and efficient circulation and access for motor vehicles, bicycles, pedestrians, and transit. Bicycle and pedestrian connections shall provide for safe and efficient circulation and access for bicycles and pedestrians.*

Response: All streets are designed in accordance with the City of Beaverton's Engineering Design Manual or Washington County standards for County arterials, except as modified by the included Sidewalk Design Modification application for Tract ZZ. A multi-modal transportation network has been planned and designed for the site and its efficacy is described in the Traffic Impact Analysis Report.

2. *The Comprehensive Plan Transportation Element Figures 6.1 through 6.23 and Tables 6.1 through 6.6 shall be used to identify ultimate right-of-way width and future Potential Street, bicycle, and pedestrian connections in order to provide adequate multi-modal access to land uses, improve area circulation, and reduce out-of-direction travel.*

Response: The Comprehensive Plan Transportation Element figures do not include the South Cooper Mountain plan area. The transportation network was planning in accordance with the South Cooper Mountain Community Plan. Additionally all streets are designed in accordance with the City of Beaverton's Engineering Design Manual.

3. *Where a future street or bicycle and pedestrian connection location is not identified in the Comprehensive Plan Transportation Element, where abutting properties are undeveloped or can be expected to be redeveloped in the near term, and where a street or bicycle and pedestrian connection is necessary to enable reasonably direct access between and among neighboring properties, the applicant shall submit as part of a complete application, a future connections plan showing the potential arrangement of streets and bicycle and pedestrian connections that shall provide for the continuation or appropriate projection of these connections into surrounding areas.*

Response: The transportation network was planned in accordance with the South Cooper Mountain Community Plan, including proposed connections to existing and planned street, bicycle, and pedestrian facilities.

4. *Streets and bicycle and pedestrian connections shall extend to the boundary of the parcel under development and shall be designed to connect the proposed development's streets, bicycle connections, and pedestrian connections to existing and future streets, bicycle connections, and pedestrian connections. A closed-end street, bicycle connection, or pedestrian connection may be approved with a temporary design.*

Response: The transportation network was planned in accordance with the South Cooper Mountain Community Plan and includes connections to existing roadways. No closed-end street is proposed. However, there are two locations where streets are stubbed out for future connection to planned streets.

5. *Whenever existing streets and bicycle and pedestrian connections adjacent to or within a parcel of land are of inadequate width, additional right-of-way may be required by the decision-making authority.*

Response: SW Scholls Ferry Road and SW Tile Flat Road are adjacent to the development site, and additional right-of-way will be provided per City and County standards. All streets are designed in accordance with the City of Beaverton's Engineering Design Manual.

6. *Where possible, bicycle and pedestrian connections shall converge with streets at traffic-controlled intersections for safe crossing.*

Response: The bicycle and pedestrian connections within the site are part of the larger South Cooper Mountain plan area infrastructure. They will eventually converge at the SW Tile Flat Road, north-south collector/SW Scholls Ferry Road, and SW 175th intersections, all of which are or will be traffic-controlled.

7. *Bicycle and pedestrian connections shall connect the on-site circulation system to existing or proposed streets, to adjacent bicycle and pedestrian connections, and to driveways open to the public that abut the property. Connections may approach parking lots on adjoining properties if the adjoining property used for such connection is open to public pedestrian and bicycle use, is paved, and is unobstructed.*

Response: The transportation network was planned in accordance with the South Cooper Mountain Community Plan, which identifies bicycle and pedestrian connections throughout the plan area.

8. *To preserve the ability to provide transportation capacity, safety, and improvements, a special setback line may be established by the City for existing and future streets, street widths, and bicycle and pedestrian connections for which an alignment, improvement, or standard has been defined by the City. The special setback area shall be recorded on the plat.*

Response: The City has not requested a special setback line for the development, and no special setback area is proposed.

9. *Access ways are one or more connections that provide bicycle and pedestrian passage between streets or a street and a destination. Accessways shall be provided as required by this code and where full street connections are not possible due to the conditions described in Section 60.55.25.13. An accessway will not be required where the impacts from development, redevelopment, or both are low and do not provide reasonable justification for the estimated costs of such accessway.*
A. Accessways shall be provided as follows:

1. *In any block that is longer than 600 feet as measured from the near side right-of-way line of the subject street to the near side right-of-way line of the adjacent street, an accessway shall be required through and near the middle of the block.*
2. *If any of the conditions described in Section 60.55.25.14. result in block lengths longer than 1200 feet as measured from the near side right-of-way line of the subject street to the near side right-of-way line of the adjacent street, then two or more accessways may be required through the block. [ORD 4397; August 2006]*
3. *Where a street connection is not feasible due to conditions described in Section 60.55.25.14., one or more new accessways to any or all of the following shall be provided as a component of the development if the accessway is reasonably direct: an existing transit stop, a planned transit route as identified by TriMet and the City, a school, a shopping center, or a neighborhood park. [ORD 4397; August 2006]*
4. *The City may require an accessway to connect from one cul-de-sac to an adjacent cul-de-sac or street.*
5. *In a proposed development or where redevelopment potential exists and a street connection is not proposed, one or more accessways may be required to connect a cul-de-sac to public streets, to other accessways, or to the project boundary to allow for future connections.*
6. *Within the South Cooper Mountain Community Plan area, the City may require an accessway to connect from multiuse paths or trails to streets, multi-use paths, or trails. [ORD 4652; February 2015]*

Response: Two cul-de-sacs are proposed: one cul-de-sac at the eastern end of Street F; and a second cul-de-sac at the eastern end of Street V.

Street F cannot connect to the proposed north-south collector Road 8B due to restrictions on residential access to collector roads and the insufficient distance from proposed east-west collector Road 6A. An accessway has been provided from the end of the cul-de-sac to the community trail to the east and to Road 6A to the north.

Street V is prevented from connecting to the Ridge PUD development to the east due to significant grade change between the eastern boundary of the subject site and the western boundary of The Ridge, in addition to the presence a parcel of land owned by a separate party between the properties.

10. Pedestrian Circulation.

A. Walkways are required between parts of a development where the public is invited or allowed to walk.

Response: All of the proposed roads within the development include sidewalks to provide pedestrian circulation throughout the site. In addition, multi-use paths provide access to the natural areas on site and will eventually connect SW Scholls Ferry Road with the property to the northeast.

B. A walkway into the development shall be provided for every 300 feet of street frontage. A walkway shall also be provided to any accessway abutting the development.

Response: This standard is intended to ensure that pedestrians can easily access developments and the buildings within them when fronting an existing or proposed public street, to encourage pedestrian access and prioritize the pedestrian experience. The development is a PUD and will provide a robust network of walkways throughout the site.

This development consists of 132.15 acres to be developed in seven phases, and occupies approximately 1,372 feet of street frontage along SW Scholls Ferry Road and 1,674 feet of

street frontage along SW Tile Flat Road. This frontage would require 5 walkways from SW Scholls Ferry Road and 6 walkways from SW Tile Flat Road.

One walkway is provided on SW Scholls Ferry Road; a multi-use/community path connects to the street along the western edge of the vegetated corridor on site. The remainder of the Scholls Ferry Road frontage is occupied by natural resource areas and stormwater facilities, and the future multifamily development site. A conceptual design for the future multifamily site is included as Sheet P3.7, and includes three walkways from the site to SW Scholls Ferry Road.

Six walkways are provided along SW Tile Flat Road. Two public street connections are proposed (Road 6A and Street K) and both will include sidewalks. Several streets are proposed to extend to SW Tile Flat Road but not to connect, due to its status as an arterial road. These streets will be closed to vehicular traffic to SW Tile Flat Road but will allow bicycle and pedestrian connections to the planned regional multi-use path along the east side of SW Tile Flat Road.

C. Walkways shall connect building entrances to one another and from building entrances to adjacent public streets and existing or planned transit stops. Walkways shall connect the development to walkways, sidewalks, bicycle facilities, alleyways and other bicycle or pedestrian connections on adjacent properties used or planned for commercial, multifamily, institution or park use. The City may require connections to be constructed and extended to the property line at the time of development.

Response: Each single-family home will be connected to the adjacent public sidewalks by a walkway.

D. Walkways shall be reasonably direct between pedestrian destinations and minimize crossings where vehicles operate.

Response: Pedestrian destinations include the open space areas on site. Sidewalks are provided along public streets and provide direct access to those spaces. In addition, off-street multi-use trails on site provide direct access to the natural areas on site.

E. Walkways shall be paved and shall maintain at least four feet of unobstructed width. Walkways bordering parking spaces shall be at least seven feet wide unless concrete wheel stops, bollards, curbing, landscaping, or other similar improvements are provided which prevent parked vehicles from obstructing the walkway. Stairs or ramps shall be provided where necessary to provide a reasonably direct route. The slope of walkways without stairs shall conform to City standards.

Response: Walkways will be paved and will be between 5 and 10 feet in width.

F. The Americans with Disabilities Act (ADA) contains different and stricter standards for some walkways. The ADA applies to the walkway that is the principal building entrance and walkways that connect transit stops and parking areas to building entrances. Where the ADA applies to a walkway, the stricter standards of ADA shall apply.

Response: No transit stops or parking areas are proposed. This standard is not applicable.

G. On-site walkways shall be lighted to 0.5 foot-candle level at initial luminance. Lighting shall have cut-off fixtures so that illumination does not exceed 0.5 foot-candle more than five (5) feet beyond the property line.

Response: On-site sidewalks will be illuminated by street lighting. Multi-use trails will be illuminated to the light level requested by the City and/or County.

11. Pedestrian Connections at Major Transit Stops. Commercial and institution buildings at or near major transit stops shall provide for pedestrian access to transit through the following measures:[...]

Response: There are no Major Transit Stops within or near the project. This standard is not applicable.

12. Assessment, review, and mitigation measures (including best management practices adopted by local agencies) shall be completed for bicycle and pedestrian connections located within the following areas: wetlands, streams, areas noted as Significant Natural Resources Overlay Zones, Significant Wetlands and Wetlands of Special Protection, and Significant Riparian Corridors within Volume III of the Comprehensive Plan Statewide Planning Goal 5 Resource Inventory Documents and Significant Natural Resources Map, and areas identified in regional and/or intergovernmental resource protection programs.[...]

Response: The proposed multi-use trail north of SW Scholls Ferry Road will cross an existing natural resource area. The trail has been located parallel to the street to minimize disturbance to the resource. The Natural Resource Assessment attached as Impact Study A has assessed and reviewed these impacts and proposed mitigation measures.

13. New construction of bicycle and pedestrian connections along residential rear lot lines is discouraged unless no comparable substitute alignment is possible in the effort to connect common trip origins and destinations or existing segment links.

Response: The proposed Community Trail that parallels the on-site vegetated corridor runs between the rear lot lines of some homes that back to this corridor and the vegetated corridor. This alignment was selected to closely follow the SCM Community Plan trail network and to connect the neighborhoods within the PUD to the neighborhood park in the center. The applicant intends to maintain clear visibility between the adjacent lots, the trail, and the wetland by establishing maximum fence heights and/or requiring the use of fencing that does not obscure sight between adjacent properties and the proposed trail.

14. Street and Bicycle and Pedestrian Connection Hindrances. Street, bicycle, and/or pedestrian connections are not required where one or more of the following conditions exist:

- A. Physical or topographic conditions make a general street, bicycle, or pedestrian connection impracticable. Such conditions include but are not limited to the alignments of existing connecting streets, freeways, railroads, slopes in excess of City standards for maximum slopes, wetlands or other bodies of water where a connection could not reasonably be provided;*
- B. Existing buildings or other development on adjacent lands physically preclude a connection now and in the future, considering the potential for redevelopment; or,*
- C. Where streets, bicycle, or pedestrian connections would violate provisions of leases, easements, covenants, or restrictions written and recorded as of May 1, 1995, which preclude a required street, bicycle, or pedestrian connection.*

Response: The site is significantly sloped at the northern and eastern ends. A multi-use trail is proposed north of SW Scholls Ferry Road, east of SW Tile Flat Road, and through the site to the west of the vegetated corridor. The SW Tile Flat Road facility may include elevation gain but is a reasonable connection.

60.55.30. Minimum Street Widths.

Minimum street widths are depicted in the Engineering Design Manual

Response: Streets within the proposed PUD include local L1 and L2 streets, a neighborhood collector, and two collector streets. All streets meet the minimum street widths depicted in the EDM.

60.55.35. Access Standards.

1. *The development plan shall include street plans that demonstrate how safe access to and from the proposed development and the street system will be provided. The applicant shall also show how public and private access to, from, and within the proposed development will be preserved*

Response: The application contains a street plan and traffic impact analysis that describe the safe access to and from the development. See P0.4, P2.1 through P2.6, and Impact Study E.

2. *No more than 25 dwelling units may have access onto a closed-end street system unless the decision-making authority finds that identified physical constraints preclude compliance with the standard and the proposed development is still found to be in compliance with the Facilities Review criteria of Section 40.03.*

Response: Initially, the streets constructed with the project will have limited connections to other streets and will stub out at the site's northern and northeastern property lines. The Ridge at South Cooper Mountain development to the east will construct the eastern half of SW Strobel Road and will provide connections to proposed Streets A and U and continuation of Road 8B.

Street F terminates in a cul-de-sac at the eastern end, and provides access to 25 dwelling units (Lots 489-506). Lots 507-519 have access from both Street F and Street BB via an alley connection to Street BB.

Street V terminates in a cul-de-sac at the eastern end, and provides access to 8 dwelling units (Lots 175-182).

3. *Intersection Standards.*

A. Visibility at Intersections. All work adjacent to public streets and accessways shall comply with the standards of the Engineering Design Manual except in Regional and Town Centers.[...]

Response: All intersections and streets are design in accordance with the visibility standards of the Engineering Design Manual.

B. Intersection angles and alignment and intersection spacing along streets shall meet the standards of the Engineering Design Manual and Standard Drawings.

1. *Local street connections at intervals of no more than 330 feet should apply in areas planned for the highest density multiple use development.[...]*

Response: The high density area of the site is the R1 zone portion of the site, located in the southwest corner of the site (South phase). The development of this site will be reviewed through a future land use application. Access to the site is proposed from Street P, a local street. No direct local street connections are proposed to the southern portion of the site because SW Scholls Ferry Road, an arterial street, forms the southern boundary of the site and Washington County has indicated that local street access is not permitted. A connection to SW Tile Flat Road is proposed from Street K and is subject to Washington County approval.

C. Driveways.

1. *Corner Clearance for Driveways.* Corner clearance at signalized intersections and stop-controlled intersections, and spacing between driveways shall meet the standards of the Engineering Design Manual and Standard Drawings.

Response: The corner clearance and spacing between driveways meet the standards of the EDM and Standard Drawings, as illustrated in Sheets P3.1 through P3.6.

2. *Shared Driveway Access.* Whenever practical, access to Arterials and Collectors shall serve more than one site through the use of driveways common to more than one development or to an on-site private circulation design that furthers this requirement.
Consideration of shared access shall take into account a minimum property ownership, surrounding land uses, and physical characteristics of the area.
Where two or more lots share a common driveway, reciprocal access easements between adjacent lots may be required.

Response: No shared driveway accesses are proposed.

3. *No new driveways for detached dwellings shall be permitted to have direct access onto an Arterial or Collector street except in unusual circumstances where emergency access or an alternative access does not exist. Where detached dwelling access to a local residential street or Neighborhood Route is not practicable, the decision-making authority may approve access from a detached dwelling to an Arterial or Collector.*

Response: No proposed driveways will have access onto an Arterial or Collector street.

60.55.40. Transit Facilities.

Transit routes and transit facilities shall be designed to support transit use through provision of transit improvements. These improvements shall include passenger landing pads, accessways to the transit stop location, or some combination thereof, as required by TriMet and the City, and may also include shelters or a pad for a shelter. In addition, when required by TriMet and the City, major industrial, institution, retail, and office developments shall provide either a transit stop on site or a pedestrian connection to a transit stop adjacent to the site.

Response: No transit facilities are present within the site or within the South Cooper Mountain plan area. These standards are not applicable.

H. 60.60. TREES AND VEGETATION.

2. Removal and Preservation Standards.

- A. *All removal of Protected Trees shall be done in accordance with the standards set forth in this section.*
- B. *Removal of Landscape Trees and Protected Trees shall be mitigated, as set forth in section 60.60.25.*
- C. *For SNRAs and Significant Groves, the following additional standards shall apply:*
 1. *The minimum DBH of non-exempt surveyed trees that must be preserved on a site is as follows:*
 - a) *Multiple Use zoning districts: Fifteen percent (15%) of the DBH of non-exempt surveyed trees found on a project site.*
 - b) *Residential, Commercial, or Industrial zoning district: Twenty five percent (25%) of the DBH of non-exempt surveyed trees found on a project site.*

Response: No Landscape Trees or Protected Trees exist on the site, and the provisions of 2.A and B are not applicable.

SNRAs do exist on the site and the site is located within a residential zoning district, therefore the provisions of C.1.b above apply. Removal of 15 trees and 19.9% of the

total DBH of non-exempt trees is proposed within the SNRA on site. Mitigation is not required.

2. *DBH to be retained shall be preserved in cohesive areas, termed Preservation Areas, when development is proposed in SNRAs or Significant Groves.*

Response: Trees not proposed to be removed in the SNRAs on site will be preserved. They will be retained in cohesive/Preservation areas and preserved within natural resources tracts.

3. *Native understory vegetation and trees shall be preserved in Preservation Areas.*

Response: Native and understory vegetation and trees will be preserved within the natural resource tracts.

4. *Preservation Areas, conditioned for protection through the Development Review process, shall be preserved in clusters that are natural in appearance rather than in linear strips. Preservation Areas should connect with adjoining portions of the Significant Grove or SNRA on other sites.*

Response: No Preservation Areas are present on site. Natural resource tracts are proposed in the resources' existing location, which is a somewhat linear feature following a stream.

5. *Preservation Areas, conditioned for protection through the Design Review process, shall be set aside in conservation easements and recorded with a deed restriction with Washington County, unless otherwise approved by the City. The deed restriction shall prohibit future development and specify the conditions for maintenance if the property is not dedicated to a public agency.*

Response: Preservation Areas are not proposed through Design Review. This standard is not applicable.

6. *Preservation Areas, conditioned for protection through the Land Division process, shall be set aside in tracts and recorded with a deed restriction with Washington County, unless otherwise approved by the City. The deed restriction shall prohibit future development and specify the conditions for maintenance if the property is not dedicated to a public agency.*

Response: Natural resource/Preservation areas will be placed in preservation tracts if conditioned through the Land Division process.

7. *Within the development review process, where a person is presented with a particular decision whether to retain a native or non-native tree, the native species shall be retained provided all other considerations between the two categories of trees remain equal. Non-native tree species may also be retained for aesthetic, unique condition, size, and wildlife habitat purposes.*

Response: The proposed tree removal is required for construction of infrastructure and utilities. The decision to remove them is related to their location relative to those required improvements.

8. *Hazardous and dead trees within Significant Groves and SNRAs should be fallen only for safety and left at the resource site to serve as habitat for wildlife, unless the tree has been diagnosed with a disease and must be removed from the area to protect the remaining trees.*

Response: No dead or dying trees are proposed to be removed.

60.60.20. Tree Protection Standards during Development.

1. *Trees classified as Protected Trees under this Code shall be protected during development in compliance with the following:*
 - A. *A construction fence must be placed around a tree or grove beyond the edge of the root zone. The fence shall be placed before physical development starts and remain in place until physical development is complete. The fence shall meet the following:*
 1. *The fence shall be a four foot (4') tall orange plastic or snow fence, secured to six foot (6') tall metal posts, driven two feet (2') into the ground. Heavy 12 gauge wire shall be strung between each post and attached to the top and midpoint of each post. Colored tree flagging indicating that this area is a tree protection zone is to be placed every five (5) linear feet on the fence to alert construction crews of the sensitive nature of the area.*
 2. *Other City approved protection measures that provide equal or greater protection may be permitted, and may be required as a condition of approval.*
 - B. *Within the protected root zone of each tree, the following development shall not be permitted:*
 1. *Construction or placement of new buildings.*
 2. *Grade change or cut and fill, except where hand excavation is approved with the submittal of an arborist's report, as part of application approval.*
 3. *New impervious surfaces.*
 4. *Trenching for utilities, irrigation, or drainage.*
 5. *Staging or storage of any kind.*
 6. *Vehicle maneuvering or parking*

Response: Sheets LTP-0 through LTP-7 identify the locations of tree protection fencing. Sheet LTP-0 and Impact Study F provide tree protection detail in compliance with A and B above. Trees to be retained will be protected by a 5-foot tall chain-link fence located around the drip line of the tree. The proposed tree protection fencing exceeds these requirements.

60.60.25. Mitigation Requirements.

1. *The following standards shall apply to mitigation for the removal of Significant Individual Trees or trees within Significant Groves or SNRAs.*
 - A. *All mitigation tree planting shall take place in conformance with accepted arboricultural practices and shall be spaced a minimum of ten (10) feet apart.*
 - B. *As of May 19, 2005, all trees planted for the purpose of tree removal mitigation shall be maintained in accordance with the approved mitigation plan. Monitoring of mitigation planting shall be the ongoing responsibility of the property owner where mitigation trees are located, unless otherwise approved through Development Review. Monitoring shall take place for a period of two (2) years. Trees that die shall be replaced in accordance with the tree replacement standards of this section.*
 - C. *As of May 19, 2005, all trees planted for the purpose of tree removal mitigation shall be set aside in a conservation easement or a separate tract and shall be designated as "Mitigation Trees" and recorded with a deed restriction identifying the trees as "Mitigation Trees".*
 - D. *Each Mitigation Tree planted shall be insured through a performance security, equal to 110 percent of the cost of the landscaping, filed with the City for a period of two (2) years to ensure establishment of the mitigation planting.*
 - E. *Street trees shall not be counted as providing mitigation of a SNRA or Significant Grove.*
 - F. *Transplanting trees within the project site is not subject to mitigation. However, a performance security is required for transplanted tree(s) to insure that the tree(s) will be replaced if the tree(s) is dead or dying at the end of two (2) years.*
2. *Mitigation for the removal of trees from Significant Groves or SNRAs shall be required as follows:*
 - A. *Calculate the total DBH of the trees to be removed. Denote both deciduous and coniferous trees in separate tables; however, both tables will result in the sum total of the DBH to be removed.*

- B. *If the total DBH of trees to be removed is less than or equal to 50% of the total DBH of surveyed trees on the site, then no mitigation is required for the trees to be removed.*
- C. *If the total DBH of trees to be removed is greater than 50% of the total DBH of surveyed trees on site, then mitigation is required for the amount of DBH to be removed that exceeds 50% of the total DBH of surveyed trees on site. For example, if 75 inches is the total amount of DBH to be removed from a site and 60 inches of DBH represents 50% of the total surveyed DBH, then 15 inches of DBH is the total required amount of mitigation.*

Response: As shown in the tree table of Sheet LTP-7 and in Impact Study F, less than 50% of the DBH of the trees within the SNRA will be removed (19.9%) and no mitigation is required.

- 3. *In addition to the requirements listed in Section 60.60.25.1. Mitigation Requirements, the following mitigation requirements shall apply for the removal of trees from Significant Groves or SNRAs.*
 - A. *Dead or dying trees within a Significant Grove or SNRA shall be fallen when required for safety. Such tree falling shall not require mitigation. However, the fallen log should remain in the Significant Grove or SNRA, to serve as habitat for wildlife, unless the tree has been diagnosed with a disease and the log must be removed from the area to protect the remaining trees.*

Response: No dead or dying trees are proposed to be removed.

- B. *All trees planted for mitigation must meet the following minimum requirements:*
 - 1. *Deciduous trees shall be replaced with native deciduous trees that are no less than two caliper inches (2") in diameter.*
 - 2. *Coniferous trees shall be replaced with native coniferous trees that are no less than three feet (3') in height and no more than four feet (4') in height. A three foot (3') mitigation tree shall equate to 2" DBH and four foot (4') mitigation tree will equate to 3" DBH.*
 - 3. *The total linear DBH measurement of the trees to be removed shall be mitigated with the necessary number of trees at least two caliper inches (2") in diameter.*

Response: As noted above, no mitigation is required.

- 4. *Significant Grove or SNRA on-site mitigation, 2:1 planting ratio.*
 - A. *Residential, Commercial, or Industrial zoning districts: For tree removal proposals which remove more than 50% and up to and including 75% of the surveyed non-exempt DBH, if all mitigation tree planting is to occur on-site, the ratio for planting shall be on a 2:1 basis. For example, if 20 inches of DBH is the total amount of required mitigation, if all the mitigation planting occurs on the site where the removal is to occur, then only 10 inches of DBH is required to be planted.*
- 5. *Significant Grove or SNRA off-site mitigation, 1:1 planting ratio.*
 - A. *Residential, Commercial, or Industrial zoning districts: For tree removal proposals which remove more than 50% and up to and including 75% of the surveyed non-exempt DBH, if mitigation tree planting is to occur off-site, the ratio for planting shall be on a 1:1 basis.*
- 6. *Significant Grove or SNRA Tree Plan 3 mitigation, 1:1 planting ratio.*

Response: The proposed development is not removing more than 50% of the DBH of trees on site and is not subject to Tree Plan 3 review. These standards are not applicable.

- 7. *In-Lieu fee. If the total caliper inch on-site- or off-site tree planting mitigation does not equal the DBH inch removal or if no tree planting mitigation is proposed, the remaining or total caliper inch tree planting mitigation shall be provided as a fee in-lieu payment. The in-lieu fee shall be specified in the Community Development In-Lieu Fee schedule. Fee revenues shall be deposited in the City's Tree Mitigation Fund.*

Response: No mitigation is required, and no in-lieu fee is proposed.

I. 60.65. UTILITY UNDERGROUNDING.

60.65.15. Regulation.

All existing and proposed utility lines within and contiguous to the subject property, including, but not limited to, those required for electric, communication, and cable television services and related facilities shall be placed underground as specified herein. The utilities required to be placed underground shall be those existing overhead utilities which are impacted by the proposed development and those utilities that are required to be installed as a result of the proposed development.[...]

60.65.20. Information on Plans.

The applicant for a development subject to design review, subdivision, partition, or site development permit approval shall show, on the proposed plan or in the explanatory information, the following:

- 1. Easements for all public and private utility facilities;*
- 2. The location of all existing above ground and underground public and private utilities within 100 feet of the site;*
- 3. The proposed relocation of existing above ground utilities to underground; and*
- 4. That above ground public or private utility facilities do not obstruct vision clearance areas pursuant to Section 60.55.35.3 of this Code.*

Response: Public Utility Easements (PUEs) are being provided along public streets per City of Beaverton and Washington County roadway standards. The applicant will coordinate with franchise utility providers (PGE, Comcast, Frontier, etc.) on undergrounding of existing overhead utilities along Scholls Ferry Road and Tile Flat Road frontages at the time of site development.

The main PGE overhead lines on Scholls Ferry Road and Tile Flat Road are on the opposite side of the development frontage (south and west, respectively) and will not be undergrounded with this development. The utilities within and contiguous to the site will be placed underground, with the possible exception of SW Scholls Ferry Road if needed to meet Washington County standards. See Sheets P5.1 through P5.6.

J. 60.67. SIGNIFICANT NATURAL RESOURCES.

60.67.05. Local Wetland Inventory.

Prior to issuing a development permit, the Local Wetland Inventory map shall be reviewed to determine if the site proposed for development is identified as the location of a significant wetland.

Response: A Local Wetland Inventory was adopted by the City in February 2015. The site has been identified as the location of Wetland W-C, which was not classified as a significant wetland by the LWI. The wetland delineation report is included in Impact Study A as Appendix A and did not identify a wetland in the location of Wetland W-C.

60.67.10. Significant Riparian Corridors.

Prior to issuing a development permit, the list of Significant Riparian Corridors shall be reviewed to determine if the site proposed for development is identified as being listed corridor.

Response: The site is identified as containing riparian corridors for which protective buffers will be established and enforced. CWS has identified required mitigation for disturbance (see Appendix B). The site plans indicate the sensitive areas for which buffer protections will be established, locations of encroachments, and areas used for mitigation.

VIII. CONCLUSION

The request for approval to develop the Scholls Heights at South Cooper Mountain planned unit development is consistent with the applicable standards of the City of Beaverton Community Development Code, the South Cooper Mountain Community Plan, the Beaverton Comprehensive Plan and standards for Planned Unit Development, Design Review, Tree Plan, Replat, and Subdivision Preliminary Plat approval. West Hills Land Development, therefore, respectfully requests approval of this combined application.